(Rev. 01/21) Complaint for Violation of Civil Rights (Prisoner)

UNITED STATES DISTRICT COURT

for the

Western District of New York

Plaintiff(s)

(Write the full name of each plaintiff who is filing this complaint. If the names of all the plaintiffs cannot fit in the space above, please write "see attached" in the space and attach an additional page with the full list of names.)

Defendant(s)

(Write the full name of each defendant who is being sued. If the names of all the defendants cannot fit in the space above, please write "see attached" in the space and attach an additional page with the full list of names. Do not include addresses here.)

COMPLAINT FOR VIOLATION OF CIVIL RIGHTS

(Prisoner Complaint)

NOTICE

Federal Rules of Civil Procedure 5.2 addresses the privacy and security concerns resulting from public access to electronic court files. Under this rule, papers filed with the court should *not* contain: an individual's full social security number or full birth date; the full name of a person known to be a minor; or a complete financial account number. A filing may include *only*: the last four digits of a social security number; the year of an individual's birth; a minor's initials; and the last four digits of a financial account number.

Except as noted in this form, plaintiff need not send exhibits, affidavits, grievance or witness statements, or any other materials to the Clerk's Office with this complaint.

In order for your complaint to be filed, it must be accompanied by the filing fee or an application to proceed in forma pauperis.

IN	THE	UN	ITED	STA	TES	DISTE	CICT	COU	RT
FO	R TH	ΕV	VEST	ERN	DIST	TRICT	OF I	NEW	YORK

ADAM BENNEFIELD, SR.

Plaintiff,

٧.

HONORABLE JUDGE WILLIAM M., BIOLLERS, JSC IN INDIVIDUAL AND OFFICAL CAPACITY 95 FRANKLIN STREET, BUFFALO, NEW YORK 14202

HONORABLE JUDGE SHARON M. LOVALLO, JFC IN INDIVIDUAL AND OFFICAL CAPACITY 1 NIAGARA PLAZA, BUFFALO, NEW YORK 14202

ERIE COUNTY ASSIGNED COUNSEL PROGRAM

Buttalo, Hewrorn 14202

IN OFFICAL CAPACITY

A.D.A. RYAN D. HAGGERTY, ESQ. IN INDIVIDUAL AND OFFICAL CAPACITY 25 DELAWARE AVENUE BUFFALO, NEW YORK 14202

AD.A. GINA M. GRAMGLIA, ESQ.
IN INDIVIDUAL AND OFFICAL CAPACITY
25 DELAWARE AVENUE
BUFFALO, NEW YORK 14202

A.D.A. JUSTIN H. CALDWELL, ESQ.
IN INDIVIDUAL AND OFFICAL CAPACITY
25 DELAWARE AVENUE
BUFFALO, NEW YORK 14202

A.D.A. COLLEN CURT CABLE, ESQ.
IN INDIVIDUAL AND OFFICAL CAPACITY

Defendants
PARTDES TO SULT
SUMMONS
CIVIL ACTION NO. ____

25 DELAWARE AVENUE BUFFALO, NEW YORK 14202

DISTRICT ATTORNEY JOHN FLYNN
IN INDIVIDUAL AND OFFICAL CAPACITY
25 DELAWARE AVENUE
BUFFALO, NEW YORK 14202

ACTING DISTRICT ATTORNEY MICHAEL KEANE
IN INDIVIDUAL AND OFFICAL CAPACITY
25 DELAWARE AVENUE
BUFFALO, NEW YORK 14202

DETECTIVE MICHAEL STRIEJEWSKE TOWN OF CHEEKTOWAGA POLICE DEPARTMENT IN INDIVIDUAL AND OFFICAL CAPACITY 3223 UNION ROAD, CHEEKTOWAGA NEW YORK 14227

ECMC (ERIE COUNTY MEDICAL CENTER) IN INDIVIDUAL AND OFFICAL CAPACITY 468 GRIDER STREET BUFFALO, NEW YORK1 4215

PRINCIPAL MELISSA MITCHELL,
CHEEKTOWAGA UNION EAST SCHOOL
UNION ROAD
CHEEKTOWAGA NEW YORK 14227
IN INDIVIDUAL AND OFFICAL CAPACITY

ASST. PRINCIPAL STEPHANIE ANDERSON CHEEKTOWAGA UNION EAST SCHOOL UNION ROAD CHEEKTOWAGA NEW YORK 14227 IN INDIVIDUAL AND OFFICAL CAPACITY

ASST. PRINCIPAL JUIA HAMELS
CHEEKTOWAGA UNION EAST SCHOOL
UNION ROAD
CHEEKTOWAGA NEW YORK 14227
IN INDIVIDUAL AND OFFICAL CAPACITY

RECEPTIONIST JANE DOE

CHEEKTOWAGA UNION EAST SCHOOL UNION ROAD CHEEKTOWAGA NEW YORK 14227 IN INDIVIDUAL AND OFFICAL CAPACITY

RECEPTIONST JANE DOE,
CHEEKTOWAGA UNION EAST SCHOOL
UNION ROAD
CHEEKTOWAGA NEW YORK 14227
IN INDIVIDUAL AND OFFICAL CAPACITY

SECURITY GUARD, JOHN DOE, CHEEKTOWAGA UNION EAST SCHOOL UNION ROAD CHEEKTOWAGA NEW YORK 14227 IN INDIVIDUAL AND OFFICAL CAPACITY

CHEEKTOWAGA UNION EAST SCHOOL
CHEEKTOWAGA UNION EAST SCHOOL
UNION ROAD
CHEEKTOWAGA NEW YORK 14227
IN INDIVIDUAL AND OFFICAL CAPACITY

TH	E STATE OF NEW YO	RK
— IN	OFFICAL CAPACITY	

ATTORNEY EMILY TROTT, ESQ 70 NIAGARA STREET BUFFALO, NEW YORK 14202 IN INDIVIDUAL AND OFFICAL CAPACITY

ATTORNEY ROBERT CUTTING JR. ESQ. 17 LIMESTONE DRIVE SUITE 1 WILLIAMSVILLE, NY 14221 IN INDIVIDUAL AND OFFICAL CAPACITY

ATTORNEY PAUL DELL, ESQ.
IN INDIVIDUAL AND OFFICAL CAPACITY
ATTORNEY CLAYTON LENDHART, ESQ.
17 LIMESTONE DRIVE SUITE 1
WILLIAMSVILLE, NY 14221
IN INDIVIDUAL AND OFFICAL CAPACITY
DR. ANN NATASHA CERVANTES
300 INTERNATIONA; DRIVE
WILLAIMSVILLE, NY 14221
IN INDIVIDUAL AND OFFICAL CAPACITY
SHERIFF JOHN GARCIA OF ERIE COUNTY HOLDING CENTER,
ERIE COUNTY HOLDING CENTER
40 DELAWARE AVENUE,
BUFFALO, NEW YORK 14202
IN INDIVIDUAL AND OFFICAL CAPACITY
CHEIF JEFFERY HARTMAN OF ERIE COUNTY HOLDING CENTER
ERIE COUNTY HOLDING CENTER
40 DELAWARE AVENUE,
BUFFALO, NEW YORK 14202
IN INDIVIDUAL AND OFFICAL CAPACITY
SUMMONS
Date Summons filed:/ Plaintiff designated ERIE COUNTY as place of venue for this action
TO THE ABOVE-NAMED DEFENDANTS:
You are hereby summoned and required to serve on Plaintiff an answer to the Complaint in this action within twenty (20) days after the service of this summons, exclusive of the day of

You are hereby summoned and required to serve on Plaintiff an answer to the Complaint in this action within twenty (20) days after the service of this summons, exclusive of the day of service, or within thirty (30) days after service is complete if this summons is not personally delivered to you within the State of New York. In case of your failure to answer, judgment will be taken against you by default for the relief demanded in the complaint.

	Papers to be served by on Porties
	1 Han Sharon M. Lovallo JEC Erre County Surrang Court
	Erre Comby Supreme Court One Miagara Plaza Briffeld, Men York 14202
	2 Hon-William M. Boller JSC Enc County Bothing Suprame Court 25 Delaware Avenue
	Buttele, Alex York 19202
	3. D.A. John Flynn, Ess (Acting) D. A. Hischael Reene Ess. A.D.A. Ryan Heggerty Ess A.D.A. Ging H. Granglia
	A.D.A Colleen Curtin Cabel District Attorney Office 25 Delawer Arene Biffsto, New York 14202
(1. Erie County Assigned Counted Rogram 403 Main Street, Site 215 Ballo, New York 14203
	52Holo, New York 14203

	Case 1:24-cv-01064-JLS
ì	9 De 12 (2)
	9. Dr. Motesta Cerrantes. 300 International Drive
	Wilhensville, N.Y. 14221
	10 And Defective Michael (1) 3223 Union Road
	And Defective Michael
	3223 Unión Road
	Cheektowage, NY 14227
	1. Town of Charlowage New York 3301 Broadway Charlowage, Henryth 14227
	3301 Ba Do
	Chekhwase Henrych, 14217
	12. Attorney General Office
4	
	4
	B. Attorney Clayton J. Leadhart
	13. Attorney Clayton J. Lendhart Attorney of Can Drive, St. 1 Williamsville, N. Y. 14221
Andrea	Millimetine Drive, St. 1
	Williamsville, N. Y. 1422

I. The Parties to This Complaint

A. The Plaintiff(s)

Provide the information below for	r each	plaintiff	named	in the	complaint.	Attach	additional	pages if
needed.					_			

Name

All other names by which

you have been known:

ID Number

Current Institution

Address

999 (P)	
grie County &	Le Win Center
40 Delas	in Avenue
100	100

B. The Defendant(s)

Provide the information below for each defendant named in the complaint, whether the defendant is an individual, a government agency, an organization, or a corporation. Make sure that the defendant(s) listed below are identical to those contained in the above caption. For an individual defendant, include the person's job or title (if known) and check whether you are bringing this complaint against them in their individual capacity or official capacity, or both. Attach additional pages if needed.

Defendant No. 1

Name

Job or Title (if known)

Shield Number

Employer

Address

Hanacahla Wil	lian M. Bolleg JSC
Judao Ecre	County Supreme Court
3	

(95) QS Franklin Strek State

City State

Individual capacity Official capacity

Defendant No. 2

Name

Job or Title (if known)

Shield Number

Employer

Address

Honorable Judge Sharon M. Lovallo, Judge Erie County family Court

City State Una Magera Vezas

State

Zip Code

Individual capacity Official capacity

Zip Code

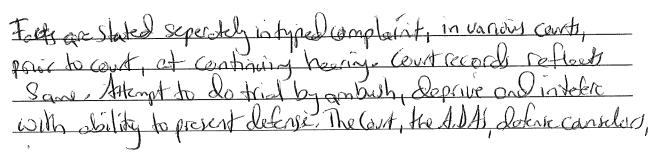
(Rev. 01	/21) Complaint for Violation of Civil Rights (Prisoner)					
	Defendant No. 3 Name Job or Title (if known) Shield Number Employer Address	Ene Country Awigned Counted Program 438 Kleinstreet Buffalo 14302				
		City State Zip Code Individual capacity Official capacity				
	Defendant No. 4 Name Job or Title (if known) Shield Number Employer Address	Associated Attorney 25 Delawire Avenue City State Zip Code Individual capacity State Tapacity				
П.	immunities secured by the Constitution an					
	the Constitution and [federal laws federal constitutional or statutory]	ng the "deprivation of any rights, privileges, or immunities secured by]." 42 U.S.C. § 1983. If you are suing under section 1983, what right(s) do you claim is/are being violated by state or local officials? Edglical (Shts, Bredy, Gistia) CP (245.20(1)) ext, Fifth Amendment Suth Amendment, Cruil Ryhts Low 12, Equal Potection				
	C. Plaintiffs suing under <i>Bivens</i> may	only recover for the violation of certain constitutional rights. If you stitutional right(s) do you claim is/are being violated by federal				

ev. 01/2	1) Compla	int for Violation of Civil Rights (Prisoner)
	D.	Section 1983 allows defendants to be found liable only when they have acted "under color of any statute, ordinance, regulation, custom, or usage, of any State or Territory or the District of Columbia." 42 U.S.C. § 1983. If you are suing under section 1983, explain how each defendant acted under color of state or local law. If you are suing under <i>Bivens</i> , explain how each defendant acted under color of federal law. Attach additional pages if needed.
		Each defendant, has worked and conspired to diolate detendent
		federal law. Attach additional pages if needed. Each defendent, has worked and conspired to work defendent Plaintiff right under color of State Statue, or dinarie, regulations Customs and usages
		Customs and usages
I.		ner Status
	Indicat	te whether you are a prisoner or other confined person as follows (check all that apply):
	X	Pretrial detainee
		Civilly committed detainee
		Immigration detainee
		Convicted and sentenced state prisoner
		Convicted and sentenced federal prisoner
		Other (explain)
V.	Statem	ent of Claim
	alleged further any cas	s briefly as possible the facts of your case. Describe how each defendant was personally involved in the wrongful action, along with the dates and locations of all relevant events. You may wish to include details such as the names of other persons involved in the events giving rise to your claims. Do not cite ses or statutes. If more than one claim is asserted, number each claim and write a short and plain ent of each claim in a separate paragraph. Attach additional pages if needed.
	Α.	If the events giving rise to your claim arose outside an institution, describe where and when they arose.
		Erie County Supreme Court, Eric County Ferrity Court Bothelo, Checketown
	В.	If the events giving rise to your claim arose in an institution, describe where and when they arose.
		Ene County Holding Center, from Oct. 2022 - present

Rev. 01/21)	Complaint	for 1	Violation	of Civil	Rights	(Prisoner)
Rev. 01/211	Complaint	IOL	violation	OI CIVII	Kignts	THSOMET

C.	What date and approximate time did the events giving rise to your claim(s) occur?					
	Host Cevent October, 17, 2024					

D. What are the facts underlying your claim(s)? (For example: What happened to you? Who did what? Was anyone else involved? Who else saw what happened?)



V. Injuries

If you sustained injuries related to the events alleged above, describe your injuries and state what medical treatment, if any, you required and did or did not receive.

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Willy) vac e cost	1 100 CON	1 1000	The state of the s	-
with het water	availled,	nental of	owed etc-	
			1	

VI. Relief

State briefly what you want the court to do for you. Make no legal arguments. Do not cite any cases or statutes. If requesting money damages, include the amounts of any actual damages and/or punitive damages claimed for the acts alleged. Explain the basis for these claims.

Suk a tempotary injunction, protuning into	whon declary relief
indiching outrageous conduct by detailent	1. Herekon
360,000,000 Total for all	

Case 1:24-cv-01064-JLS

Exhaustion of Administrative Remedies Administrative Procedures VII.

The Prison Litigation Reform Act ("PLRA"), 42 U.S.C. § 1997e(a), requires that "[n]o action shall be brought with respect to prison conditions under section 1983 of this title, or any other Federal law, by a prisoner confined in any jail, prison, or other correctional facility until such administrative remedies as are available are exhausted."

Administrative remedies are also known as grievance procedures. Your case may be dismissed if you have not exhausted your administrative remedies.

A.	Did your claim(s) arise while you were confined in a jail, prison, or other correctional facility?
	Yes
	☐ No
	If yes, name the jail, prison, or other correctional facility where you were confined at the time of the events giving rise to your claim(s).
	Eric County Holding Center.
В.	Does the jail, prison, or other correctional facility where your claim(s) arose have a grievance procedure?
	Yes
	□ No
	Do not know
C.	Does the grievance procedure at the jail, prison, or other correctional facility where your claim(s) arose cover some or all of your claims?
	Yes
	☐ No
	Do not know
	If yes, which claim(s)?
	Dealing with Legal Hail held, Sypress and legal Property Access to Courts

D.	Did you file a grievance in the jail, prison, or other correctional facility where your claim(s) arose concerning the facts relating to this complaint?
	Yes
	□ No
	If no, did you file a grievance about the events described in this complaint at any other jail, prison, or other correctional facility?
	Yes
	□ No
E.	If you did file a grievance:
	1. Where did you file the grievance?
	Enc County Molding Center.
	2. What did you claim in your grievance?
	Derial of Access to Cout, Inteference with organy Cares, confuciation of pay
	3. What was the result, if any?
	demed
	4. What steps, if any, did you take to appeal that decision? Is the grievance process completed? If not, explain why not. (Describe all efforts to appeal to the highest level of the grievance process.)
	Greved, appealed highest that they allowed me to.

F.	If you	did	not	file a	grievance:
н. •	II you	ulu	1101	1110 0	gife vance.

If there are any reasons why you did not file a grievance, state them here:

If you did not file a grievance but you did inform officials of your claim, state who you informed, when and how, and their response, if any:

Please set forth any additional information that is relevant to the exhaustion of your administrative G. remedies.

Dep Amolian Chief Hartman, and Various Seargents. Even

(Note: You may attach as exhibits to this complaint any documents related to the exhaustion of your administrative remedies.)

VIII. Previous Lawsuits

The "three strikes rule" bars a prisoner from bringing a civil action or an appeal in federal court without paying the filing fee if that prisoner has "on three or more prior occasions, while incarcerated or detained in any facility, brought an action or appeal in a court of the United States that was dismissed on the grounds that it is frivolous, malicious, or fails to state a claim upon which relief may be granted, unless the prisoner is under imminent danger of serious physical injury." 28 U.S.C. § 1915(g).

To the best of your knowledge, have you had a case dismissed based on this "three strikes rule"?

Yes

If yes, state which court dismissed your case, when this occurred, and attach a copy of the order if possible.

4.	Hav acti	ve you filed other lawsuits in state or federal court dealing with the same facts involved in this on?
		Yes
	X	No
В.	If y	our answer to A is yes, describe each lawsuit by answering questions 1 through 7 below. (If there is re than one lawsuit, describe the additional lawsuits on another page, using the same format.)
	1.	Parties to the previous lawsuit
		Plaintiff(s)
		Defendant(s)
	2.	Court (if federal court, name the district; if state court, name the county and State)
	3.	Docket or index number
	4.	Name of Judge assigned to your case
	5.	Approximate date of filing lawsuit
	6	Is the case still pending?
	6.	
		Yes
		☐ No
		If no, give the approximate date of disposition.
	7.	What was the result of the case? (For example: Was the case dismissed? Was judgment entered in your favor? Was the case appealed?)

Certification and Closing IX.

Under Federal Rule of Civil Procedure 11, by signing below, I certify to the best of my knowledge, information, and belief that this complaint: (1) is not being presented for an improper purpose, such as to harass, cause unnecessary delay, or needlessly increase the cost of litigation; (2) is supported by existing law or by a nonfrivolous argument for extending, modifying, or reversing existing law; (3) the factual contentions have evidentiary support or, if specifically so identified, will likely have evidentiary support after a reasonable opportunity for further investigation or discovery; and (4) the complaint otherwise complies with the requirements of Rule 11.

112/21/24

For Parties Without an Attorney A.

I agree to provide the Clerk's Office with any changes to my address where case-related papers may be served. I understand that my failure to keep a current address on file with the Clerk's Office may result in the dismissal of my case.

Date of signing:	3/24		
Signature of Plaintiff Printed Name of Plaintiff Prison Identification # Prison Address	Adam Benned 44965 Eric County Hole Buffalo City	ding Conter 40	Delewake Avenue 19202 Zip Code
For Attorneys			
Date of signing:			
Signature of Attorney			
Printed Name of Attorney			
Bar Number			
Name of Law Firm			
Address			
	City	State	Zip Code
Telephone Number			
E-mail Address			

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B.

In the United States District Gourt
For the Western District of New York Adam Bernefield, Sc Plaintiff DECLARATION BENNEFIELD Honorable Judge William M. Boller, JSC. Civil Action No. Bennefield hereby declares:

1. I attended the blood Priceding, Chech beck hearing on October 17,2024, with regards to Adembernofield. Case was Acaple of the State of Hew York v. Adem Benefield Ind. #73/97-24/04 at the Eric Country Supreme Court. 2. I heard the fully colloquy. that

took place between the Court, Countel, defendant and District Attorney.

The Control Cancasion individuals in the Control as well. The hearing took place around eleven o'clock a.m. When defendants Care was supposed to be brought before the court. The proceeding was temporary postponed from Starting, due to countrier Pall Dall, Esq. being absent to the hearing. It started who countries Poul Dall Esq. Cere in, and the Defendant was brought forth soon there after to start the proceedings.

4. A argumentaile debote took forth
between Defendent and Counsel Dell. As
Defendent wented to speak to the Court and
Atty Paul Dell, did not went him speaking.
At one Point Defendent spotae to the Court,
telling the hon, Judge he had something to
Day " Court Judge Boller, childed the defendant
For Speaking.

5. I observed defendent specking more

prudently and vogetly with the Counseler Dell At one point, the Han Julge Bother again Childed defendent, and childed his aftempt at speaking with Atty Dell why the Court was speaking.

protests civily between count bell and the defendant. The court findly relented, and asked attorney bell it he wented the defendant to speak. Attorney bell reductantly allowed dependant to speak.

numerous downers and he addressed the court, saying numerous things, such as:

A, the was being denied Due Process

B. He was being denied Equal Postution

C. He was being denied the right to have a defense put forth in his behalf.

D, the was invidiously discriminated against due to a systematic faithire including.

(1) refused of assigned counted

to provide Linds trotally For mental examine and transcripts (11) (ate mental examination, due to Court and D. As forfur to have detendent evelocted be at usue presuant to they Okalhoma. Er Defendent protested about the Certificate of Comphane being Complete defeative and that in the Courtmon as evidence he had are ther persons, Jeremy Gothing more Mille Cartificate of Compliance (COC). I understood as well that he had more evidence and COC as well, sleaning from Defendents, Statements es prof. F. Although the colleging west in depth and Defendent had much more to say, he Wes Shut down by the Court: However, not before he explained Hore of his allegations was countered with

	any contention of the folsity of his Statements
T THE REAL PROPERTY CONTRACTOR CONTRACTOR CONTRACTOR	by the Court, the People, not down Countle
N 101 - 100 - 1	
	8. Before the conclusion of the
	hearing the court spoke of its digust with
	the defendent and the pressure from Alberry
	I recoll Statements like and or events soil
	like (By the Judge William H. Boiler)
	A. You blew your wife's brains
	out in front of her kids
and the state of t	B. Administrative judge in Albany Wents this defendants care
MINER NO. 18 - No. 1 - A - A - A - A - A - A - A - A - A -	Words the detendent care
	Concluded and closel.
	any resion. We will start triel
Planting and a region process commence and authorises and	and prilaing Jucors in Hovember.
	D. Counsolar shared in reised the
	Qe Giversier
This work of the State of the S	E. The Court Viciously closed the
	hearing.
N Fairlaments on the SSE State State of the pump sports of a summary	The Hon. Judge was angry, and was yelling at the defendent and pointing at him why he spoke to and at the defendant.
	the defendent and pointing at him why he
(The distinguishment of the state and a graph of the state and the state and	Spoke to and at the defendant.
he may decrease an experience of the control of the	
The state of the s	9- The Defendent, during these colleguis
	V

that the Court and DA's are suppose to have adual roll ; and not just convict but see justice is done and defendants rights are protected. But in this care, the Court and DA's Pailed in their duties:

9. Defendent addressed the court,
Speeking of late all phone extraction over
16 months ofter purported crime that was
hermful to the defense, which was not addressed
by the Court or no one else the Coised numerous
Urolations to the Court, Mone of these urolations
were addressed on the merits.

address the Court Stating their was miscandinate and the hope are using the Council as a pown to thowart rights to appeal. To force the case to trial, without preserving using, or to late to be effective. The Court was absolutely not happy with defendants claims.

a pending lowswit, and evidence would come out that presple one trying to hide, such as misconduct.

The only time the projection spoke was at this
The only time the protector spoke was at this point. Where the judge claimed its not relevant (The wrongfuldenth of Kearra Kudjon)
relevant (The Wrongfuldesth of Kearra Kudgo)
and asked the people their opinion of
whether it was relevent, the protecutor soil
no. Detense counsel seid nothing, in response.

of this proceeding is produced and accurate.
In sure it would reveal the complete touth,
minus minute errors in reference to exact
words was used.

I declare under penalty of perjury that the foregoing is true and correct. Executed at, City of Butfalo, State of New York on 10/31/24. In the United States District Court
For the Western District of Hew York Plaintiff Honorable Judge Eric County, William M. Boller, JSC, Individuel and in Official Copacity; Honorable Judge Eric County Sharon M. Lovatlo, JFC, Individual and in Official Erie County Assigned County Program in official and Individual Capacity;

ADA, Kyend Haggerty, Elg. Officed and Unofficial Especial	
A.D.A. Gine H. Grangglia, Elg- Official and Unofficial Spainty	
A.D.A. Justin H. Caldwell, Esq Official and Unofficial Capacity	
ADA Colleen Cortin Cable, Esos Official and Unothical Copacity	
District Aroman John Flynn Official and Onofficial Coperity	
Acting District Athorney Michel Keene (StIN FYMA) Official and Unofficial Copacity.	
Detective Michael Striejewske Checktowage Police Department In official and Individual Capacity.	
ECMC (Ecic County Medical Centro) In official Capacity	

Prairie Helisa Hitchell

President and Africial Copiety Ast Prings Stephenie Indian Cheek toways Union East Individual and Official Copacity Att. Pracinal Julia Hamel Chaliforder Union East Individual and official Capacity Receptored Jane Doe Cheelchowage Union East Individual and Official Capacity Receptionst Jane Doc Checketowage Union East Individual and Official Capacity Schrift Gund, John Joe Cheekhwega Union East Official and Induded Copy

Document 1

Filed 11/01/24

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	The State of Mew York official Capacity
**************************************	Chechtowage Union East School, Official Capacify
	Town of Cheek to we, Eire County, Official Copacity.
	City of Biffalo New Yorky Eric Wordy, official Gracity
	Atturney Emily Trott Esq., Individual and official
	Cpocchy
	Attorney Respect Cutting To. Esq. Individual and official
	Coperity.
	Attorney Pay/ Dell, ESE. Individual and official
	Cagacity CARTURE
	Athrey Clayton Lanhardt, Esq Individual and official
	Liveliet end Otherst Capacity

Dr. Ann Matasha (ervente)	
In Africal and unofficial	
- ;	
Coffecuty	
Shoriff John C Garcia	
In unofficial and official	
Capacity	
<u> </u>	
Chief Jeffery Hartman	
Grevence Coordinatur. En e	
County Kolding Conter in	
Unofficial and Official	
Capacity	✓
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I. JURISTICIJON	3UN3V CHA S
2. This is a civil action	outhorized by
1. This is a Civil action 42 us C. Section 1983 to	cedress the
42 USC, Section 1983 to	cedress the
42 USC: Section 1983 to deprivation, under color of S	redress the take town of the United States
deprivation, under color of S Secured by the Constitution The Constitution	cedress the take low, of rights of the United States under 28 USC 1331 and
Jay 3 (a) (3) Plaintiff seles	cedress the take low, of rights of the United States under 28 USC 1331 and lecilatory relief
deprivation, under color of S Secured by the Constitution The Constitution	cedress the take to feel of the United States under 28 UJC 1331 and lecilatory relief

by 28 USC Section 2283 and 2284 and Rule (5) of the Federal Rules of Civil Procedure. The Court has supplemental jurisdiction over plaintiffs State Law Claim under 28 U.S. C. Section 1367.

2. The Western District of New York Is an appropriate venue under 2845 (section 1391 (6)2) because it is where the events giving rise to this claim occurred.

I PLAINTIFFS

3. Plaintiff, Adem Bennefield Sr., is and wester all times mentioned herein, resided in the State of thew York, Erie County, the is currently confined in Erie County Holeling Center, Erie County, State of New York.

II DEFENDANTS

4. Defendants, Honorable William M. Boller, JSC is the Judge of Eric Country Supreme Court, Administrative Judge, handling and Pracisling over People V. Alam Bennefield the detendant, Ind. # 73197-22/001 and is responsible for overall operation of this case the U Sued in his individual and official capacity.

S. Defendant, Kenerable Sharun H. Lovalle, JFC is the Judge of Erie County Family Court, handling and presiding over Parallel Cose, In Matter of Adam Bennetical Jr., Ducket # 1-10500-22, Docket # NA-10624-22 et at and is responsible for overall operation of their cases. She is sued in her individual and official capacity

6. Defendant, Eric Country Assigned Council
Program, is the overfeel operation of Assigned Council
in Eric Country under its juris dution. Assigned
Council Program is sued in its official and unofficial
Capacity.

7. Deterlent, the State of New York, is responsible for overseing all of the employee's paid by the State State sponsored progrem, and overses criminal and family court case. New York is shed in its official Capacity.

8. Chuckbringe Union East, Defendant, is responsible for overall operation of the Poncipels Assistant principals, Clarks, Receptionist and welfare of their Students. Cheektowage Union East, is sued in its official capacity.

9. Defendent, Helisa Mitchell, Ranciple of
A William Comment of the Comment of
Shoot the welface of Shudents, and over see the
Schools staff. She is swell in her officeal and unofficial capacity
a pacity
Claus Est State of Checktoway
Julia Hamels Dane Doct to responsible for the welfare of Students, and oversees the schools
Still and oversees the schools
The state of the s
Official and unofficial capacity
11: Retendant, Security queral I John Dee Jof Cheekbowage Union East, is responsible for the Welfor of Staff and Shidents. He is swed in his official and world it
Cheep to Waga Cloud East, is responsible for the
his AC is De en Students. He is sued in
are unorticed copacity
12. Defendent Ton Collins
for the overall operation of The A (1)
complayers and residents under its willings
12. Defendant, Town of Cheek towage, is responsible for the overall operation of Town of Cheek towage compleyers and residents under its Jurisdiction Town of Cheek towage is sued in the official capacity,
13. Dra 1 2 1 00 A1
13. Deterdent, The City of Buttald, is responsible for the oxerall operation of the City of buttale, employees
the occion operation of the City of bottale, employers 1

and residents of the City of Buffele, Buffelo City, Is being such in it official againty. 14. Defendants, Attorney Emily Trott Es and Attorney Robert Cutting It Esq , under assigned Counsel Program, And to the Indigent Person, in their capacities, they foiled to perform duties by law as councided in Ene County representing the desendant in his criminal and Einstitutional proceeding rights. Trott and Cathing Ir, Eigs ore both sud in their officed and unofficed Capacity 15. Defendant, Athorney Poul Dell Esquitationed Counsel, in his capacity taled to Patent defendents Constitutional, Fundamental, Statutory rights in the Commit proceeding, Eric County. He is suel in botto official and unofficial capacity. 16 Defendent, Attorney Clayton of Lanhardt, Esq. attorney of Cow, Harlad to Daket defendant Constitutional, turdemental ryth, Statutory rights, homes
fight Gibt Typt in Civil Case In mater of Allen Benefield, a family Cart Ene Gunty He wished in both official and unofficial capacity.

Ly I Defendent Attorney Emily Trott Esq.

under crygrid counsel program, And to the Indigent.

person, in their capacities; Oversee the representation
of Plaintiff; failed to properly perform duties by

law as consclore in Eric County representing the

Defendent in his criminal and constitutional

proceeding rights. They faited to protect his was thetand

Orghts, cevil rights and were ineffective counted.

Emily Trott Esq. is Sued in her official and

unofficial capacity.

14. L. Defendent Attorney Rebert Cutting Jr. Ess under essigned counsel program, And to the indigent person, in their capacities, oversee the representation of Plain hiff, failed to projectly perform Duties by Law as counselocs in Ene Country representing the Defendent in his criminal and constitutional proceeding rights. They failed to protect his constitutional rights, Civil rights and were ineffective counsel. Robert Cutting Jr. Esg., is sued in her official and unofficial capacity.

ADA and ADA Gins III, Granaglia, Esq Athury
Athursey's acting on the behalf of the Reple Erie
County Commel Court, tooked to perform dutus
forming, Civil Cyth Cod, Statuting Comp. They both
are Sued in their official Capacity and unofficial
Capacity.

ADA Collan Curhin Cable, Esq., Appropry, acting on the behalf of the People, Esse Country Criminal Court Failed to perform duties based on clearly established for State Comptional provisions, Civil Kights of Friend and unothical Capacity.

19. Defendent Aching District Asterney Michael Kearly

(D.A. John Flynn) aching on the Beheff of the

Every Eric County Country Court who trains, supervises!

Creefeda policy Center under which flights Contribution!

Cights were volated, was grasily respect and also

not sperings the subordinates and his tailed to remedy

the violation based on clearly exhibited Federal,

State Constitutional provision, Cevil Rights Caus

.....

Statutory laws. They both are swed in their 20. Defendant Hickard Striejewske Dedrue, Charlot Waga Police Department Town, analys Town of Check bowaga, in individual and Official Capacity The Defendent, Ene winty Hedical Control (PER) Defendent Epie County, tailing to frapely train,
Supervise employees, allowing unconstitutional
Policy or custom to continue in their official
Capacity; the to the tailure of its employees. 13. Each defendant at all times mentioned in this complaint, acted under color of state law.

III. FACTS

24. Relevant herein, upon information and belief since Sept. 28, 2022, a physical altercation took place between the Plaintiff

and his wife after her intilolity. This infidelity, Spawned from her kearra Bennowed, Staying Out all night with her paramount / secret lover - lips her and him conversing, text and phone him case requested she not come home due to his Uplature mental state. That she should find else where to his when the with her person she was howing an affair with. However she came home, a given thing and after cohon ensual Plaintiff for the third have since meeting and being with his wife, doubted he no longer wanted to live.

Uncorporative, Drunk, and a deager to howife by way of 9:41. His wrists were cut as well. The will system Plantiff instilled in the power was streemed and a copy of the existing video of the loudest.

Streemed on line by his win fe?

How tempted, ECHIC CASP (PED Was to les not to lest him out by his persent ! They lest him out, knowing to lest year certies, and a markard of real down one year certies, and was admitted multiple days.

Case 1:24-cv-01064-JLS Document 1 Filed 11/01/24 Page 38 of 150 Plaint I ration the court of what took place. His
wifes in Edity, Drinking while driving and whyping
their Comonth old year on, which he had villed,
of her whipping him and stapping and beating her
Children this tep Children. That they had a
decided a restraining arder.
One was usual a lowful circler, to be honored as
State and Federal law. 28 - Marchite Children however, were used as a tor of blackmail and conven efter plainter Bot put of CPEP/CFAP at ECHC in his behalf, By family court of growing refrain from Top

wet already active against his wife several months

wife, around October 5,2022, Offer allegelly
getting kulue out the court room days carlied The Compal Cose against Plaint P. Keple U. Adam Bennefield, has went on for over two years Industrial court Benefald, multiple charges.
The freshding Judge, is Hon, William H. Boller JSC, ENE County:

Transingly as well as ineffective counsel. Even with trail The Courts have allowed the walkers and ord reguest to a fair fundamental field to be infined upon a tailors which has welless turdemental to a fair fundamental field to be infined upon a tailors which has welless turdemental to a fair trial allopates statistiffs turdemental to a fair trial allopates statistiffs turdemental to a fair trial to have countries allowers. Equal protections in the court 2 cal to punch the staining of a conviction.

31. Kon, Poller, TSL, crowing his rights are and were being violated, at the last court hearing of Oct, 17, 2024 , at Eric Country Supreme Court. After numerous protestations, than Soiler, JSC asked Counsel if perwented Plaintiff to address the Court, but not be take be rating the Plaintiff, Plaintiff after a Suing with Counsel lot him speak. Especially after a Suing with Country Plaintiff restrated the claims the Court and all farties, with reference to Ineffective Winterpole Country Employ With Trott, Sea and labert Cutting To. Who worked under Anymed Country Progress. Plaintiff address alleged Country blands of Anymed Country for their failures.

Document 1 Case 1:24-cv-01064-JLS Filed 11/01/24 Page 40 of 150 not to supply transcripts [as well as the Contiblened Court by Plaintiffs to-Se notion. The people did 32. Course / Emply Trots and Robert Custing Ity (a convey deprived plant of du lovery Arodophytical, Copino 19 to full Al Sections of It newly enviled (a) Of 245, 10 et significant consultation. For the Some Celon they also deposed the Month of the Christ to be trooly examined by psychietral ety herein the Plant of the alleged ands by the details herein the Plant of Asimple CPL D3D preservery was not done, although clearly polatedent Plaintiff Wo definet upon after of This Fathier has Jeoper de rief Statuting rights as well. Bothe Cornels were representing the Plant of for a little over I years And depart him aguel Trist 33. Upon internation and belief, attorney Land Dell Esq. Wai Sand bogging on his duties as Counsel for Referdant, the was negligent by untimely aldrewing abusing deficientaies in the Frist proceed Countly failure, deprived the defendant the shility to get unconstitutionally obtained information

Suppressed, Toget information, the feeple are Cequired by Lew to dotain product to Brody Gyla, CPC 245.20(1) (a-4). Thereby certailing the Defendant Plaintiff from asserting and/or timely asserting his right . Some of their wines are I a Federal and Shik Constitutional provisions violations Such as: A. Inoffective Stephence of counsel B. Inulian Dixaminatio C. Speed Trad Violetin under State Standards federal Standards and State States, then Relevat and State Constitution the Powers. D. Devid of the traily rightto asset adeline. E Falive to move to content search we created I. talure to challenge defentive warrants and Supporting papers 6 Falure to follow through an ineffective cornely their similar and obvious deficiencies. Canal Dell was advised these errors in Fab 2024, he has k no Steps to protect Plaint FD rights. mying discovery, only three were abbreved. These deficienties directly effected his rights to defend

agenit the snow allegations against the plaintiff. 35. Upon internation on Deliet, Council Paul Dell, Esq. aci grien, an ultimatium, to Sandbag the datident/Plaintiff and slow Lown and thwart any alternat to help. Otherwise, he would be looked down upon, looked over, and given less towardble ruling, deal with Other clients. Nonetheless, defendant / Plaintiff rights were being Sacrifical, for any reason; was an absolute blockade on the doility to defend the Plaintiff, 36. Coursels Trott and Certifing Ir. deticientais, come the same as faul Dells Yet, Trott and Cutting Irs deficiencies fell to Attorney Kaul Dell to repair ' 37 Upon into control and belief, Hone William H. Holler has participated in not making describent constitutional rights be protected, to enure atairtriela Defendant/DEIntAP hostal to aspect his own right when countel factable do 50. Plantiff gove countels the opportunity to Fix the problem. When they faced he I teintiff

addressed the problems to ton William H. Boller JSC , giving the Court the opportunity to eddress the complaints on the recordi with these constitutional abridgements: lonever, his lest others to speak to the court, Plaintiff on October 17, Legy, before than Baller. Plaintiff was childed, and even being owere of these abusin violation and deficiencies with counted forfaces, du overy, body Englis, meterial Suter proceeding / possible proceeding material, transcript, mental exemination. Hon, Boller Stated these claims whow live been addressed by countel. before this court hearing. After which, the Court Geninded the people, defend counted, friends and tamy who were in the Court som and spectated that Regardless of any rights Uislation, the triel will Continue, will not be aftered, deloyed not prevented:

38, Plaintiff here in, also requested the missing discovery, and asked it be brought before the court and to the defendent as well as coursel for the rees of Plaintiff intermed the court he had CO.Cs that were faired from other defendants, in same Eric County Court, by Eric County A Dits of the in Court, for the Courts acceptance and review in compension to Plaintiffs

Reference COC (Cortificate of Complence). Hon. though neither defence coursel nor the two ADAs denied nor objected in any sense to the truth of talstisity of his Stephenty and evidence · Upon intermedia and belief than bother was imported, bies and inferented in the outcome but uninkrasted in etair anshipuland trial, before his court. It also abrious, there was intentions of keeping the record clear of ony evidence supporting only claim by flointiff and mis conduct of otheral and outregous conduct of detectives, ADAs detente countely, and other civilians and Indust personnel. Hout offices 1 is from terred to enjother judge under his bonnel, as his the chief folitical agencies to get a conviction, and keep the record devoid and clear of reel truths, Casher than talse nortatives, meent to bring about a Illegel contiction

39. The Hon. Judge to let in his copering as a judge and personal objectives has not only allowed conduct of others, that is unknowing, to be performed deficiently in his corretroom

even after the advent of Plaintiff undignted claid, by letter in 2023, of glbg in 2023, and ordly in 2004 for various tendemental deficientary that went to the heart of the obiling to obtain efair tried, the touth scaling telephon and tout tiding process for the webjes and alleged crimes by the Marker tran Judge Boiler, for all itstensive purposes has violated the oppearance at markally , but has exhibited actual importality, bies and her become a co-conspication in vieil antitle right; and attempting to force Plantif to truel with comprine obtank, Salastaged dotested enhand, Deliberate, and with out the complete tools proper for tair obsessmed testing, as required for Federal, State Due Roces, Equal Protection, and fair trial rybots ; right to present without in

Ene County, has as well been impartial and bies, and appearance of Farriess, partiality has been uplated her comprising with the People and D. As who with platforent agencies and judges show has supervised have collided upon intermedia and belief to definite Alem Genetal Dr. away from the Patrick Side of his toming. In volution of

of Adam Sris right, Grand parents rights and Alean Sris right. To prevent his ability to defend, punch the Paternal side of the Fermily for Plaintiff alleged orines. His challenges to judge than Loudla fitness and importation, she well other judges under Fer umbrelle 1 to enforce has and the DV. Ogencies version of events.

41. Upon information and behit than Lovelley with other Court official have consisted factorists with the constitutionally. By holding proceedings in chambers. Officially telling country to supply Plaintiff with transcripts and discovery, fet off the record houng country Lendhort, delay discovery, not provide discovery now proscripts to prevent the records from being expanded, deprive defendent plaintiff with the tools to drupte allegations end be aware of the under provings of the mis conduct allegations. Here briggers, they been further with here. Conspirery with the with Million of Eric County.

Theintiff from expending the record and shaving illegel out, mis to Duct, biases and importating of

The District Amoney office, in consultation with the Agencies involved in this care, consulted Ex-Parte, and offthe record: To prevent certain facts from coming out, and technomy from which being exposed premitively. This was another circulmois method of bygasting the Plaintiff right to address the Court as will as produce withvises p. Some a tean.

Both has doing the produce withvises p. Some a tean.

43, letitioner / Plaintiff also tried to file
q motion, but with the Court pro-se and
position, it blamed the motion for transcripts
discovery, visiting rights etc. on a unconstitutional
practice of banning Pro-Se litigents who have
course I. This precipie constant is used to circumvent
evidence coming to light, and challenges based on
documentary proof.

Counselor Clayton Lendhort, assigned counsel followed suit, and either refused to respond to request for discovery and transcripts and/or just did not provide all of it /none of it to deprive Plaintiff from asserting his constitutional rights to be apprished of the charges, the basis and underpriving of allegations, claims, evidence. Counsel never provided

Plaintiff with any Locumentation jews. All to Continue the conspiratory with Judicial personnel, upon information and both of and succuming to the Political Judicial, and Domestic owners the Political Judicial, and Domestic owners agencies, and with other defendants in this Complaint.

45. Upon information and belief Erie Centy Assigned Coursel Program designed offic Giden
U. Weinwright and Girffin vi Illianious, U For indigent detendants. Lawyers are assigned and are to give effective assistance. They are to train, Supervise, use effective policy and customs, that all were lacking in this case. Attorney, Emply hott, ESQ: Rebert Cutting Ir. Esq. and Lendhart, Esq and other attorques representing the Plantiff in this matter, Augnos Council Program afford such preches to continue, and ever retikely regular to Plankith inquests. Asymed Counted Stogram, retused to grow de transcipts for both temity Court and Criminal court based on the cost of transcripts, individual discrimination and Equal Mokethin Wolker & and timely mental examination, even though explicitly needed.

46 Clain internation and before throne

year, between Oct 6,202) when Trotton (withing Ir, were purported to be assigned to Oct, 31, 2023; and Clayton Ledhot, Esq from about Of Godes present i August countl program returned to paperty over see coursels representation, and allewed the policy continue of not chellenging muling discovery; Brady Grelio, Rosario, Belley, (Mett, Vilard, material by CPL 275. 20(1)(a-4); (PC 245, D(1)(3-4) end not chillenging detecting (O(1) and Speedy Trul Goldens as was Valeked in this case under Due Process, Equal Posterhin. The in the wake of many reversals was not only prepudicul but cato strophic to leptioner / Plantitt and other Cases. Here with the Public outcry totation passure, Judicial passure, the Assymed Coursel Collaborated with Judge Baller, the D. As office, and courseloss, to allow the convertion to be tound without selequete protections and setequets Her the Plantiff with Bound deficiencies in The feeples Case

for, upon in toronthin and Belief the finding of Towns, Cities, Silvery, and Protection of its Extress. The Jak of Men Take also receives feeleral funding.

In the States coperity, they follow to prevent acts of malicious native by their failures.

Including the Judge How toller, Ess, JSC; Shards

HI, Lavello, JFC, and its egents knowing these
individuals and agencies and detendants returned to the loves, She of How your toiled to properly trains and intilized a policy and couldn't tried with the necessity thought to have a tair tried with the necessity thought properly called wrongful, resteless, regigent, deliberate allowed wrongful, resteless, regigent, deliberate acts of its employees, discensionery or not, depriving Plaintiff of his constitutival rights, civil rights,

sching under color of State Ind Violated Federal Iaw, working with their co-conspirations to blackeneil, the plaint of with physical penatrinel, psychological coercian pre-alleged crimes and post-alleged crimes to bringent a convidion of Plaint of a mentally ill man was an emotional distributional individual, was unjustly mempulated, in order an attempt to coerce him to committing a crime, that the freple could

Charges filed, Due to a media Blotz, political pressure Du, agencies pressure, and public outery, thus oversealous zeal to prosecute plaintiff in a weakened, fragile state, outragiously, tendamentally flewed and using flustiffs kieds as a borgaming tool, as a way to plaintiff to proteest them, by requiring him tout in himself in fix charges that had been yet to be tiled typits, due prices rights, and right to be left alone family cherished rights.

49. Upon information and belief, the State of Klow Will State agents and employees, in the Water of Marine number of School Shootings and mass killings Jeopardized the Children of Cheelsburge Union East, when the Defective Michael Striejewskep Cheelsburge Police department by his use of his position to break and we town or five other people to Violate Criminal Status under State law and Federal (aw, on autice Temporary Restraining Order; active in three Courts is well against the Victims Kearin Benefield, Plaintiffs loved late wife.

Two orders in Checkbowage Court, one order to froming Court. The feeple of the State of New York, then refuse to provide enderice of some, and transcripts to pervert justice, due to the mis conduct and high profile nature of this cost,

SO. Upon information and belief, the Krosenton office, in confunction with ADA Ryon D. Haggerty, Esq. Gine M. Granglin, Esq.
Dustra Caldwell, Esq.; Collen Curtin Cable Esq.
District Attorney John Flyn Esq. Acting Dustrat Storney Hickael Reener Est Working Collectively, and refused to provide legally regularly clearly established Plaintiff need for Brady, Giglo, Viledi, Rasorio, Ulet, Boxley Heterol, CPL 245 10 ef Seg; (PL 245 20 () (9-4)) CPL 245 20 (1)(KY, vii) to the defendent in Cleer violation of Equal Protection, Due Proved Right, to fair trust, to present witness in his behalf and/or favor to present a defense, torcing ineffective purpose, of coursel, under clearly established Federal, State US and NY Constitution Statue, Guil rights. These action were done under the Color of State:

ST. The Prosecutors office, and other mentioned idofendants pramed in the above paragraph 50, actions were deliberate, caculated to decerve the the detendant, the Court, the Public, the victims as alleged and were working with tempy Court Hon Shear M. Loudlo: Hon William My Boller, both Erie County Judges, and other defendants in this case to hide Police misconduct, Dudicial misconduct, by suppressing all information fewerable, exculpatory in nature, and selectively use evidence needed that I altered, to fit their nerrative for conjuction, and Deprive Plaintiff of his rights to a fair trial towit without challenge from Cayntell, has been effective since charges were tiled, All the eyes of trial, and it offer copyridion to avoid scruting, acting under color of State law Sd. The Plaintiff, at Court hearing of Oct 17,2024, culled evidence for him 17 kgsf Gordand of the Prosecutor office, technic to tolles clearly established the Powers and Equal Protection Lew With regard to their dicavery obtigetions.
Providing evidence of Some in court. To Wit multiple detainees Actual Certificate of Compliances,

Each of which contained the legal regularing of Europeine under OFL HYJJU (1) (a-4); (PL 245.20) (1) K (1-vii), Bredy, Giglio Reserio, Baxley, Wlard, Ulett and Discovery violeshow. The Prosecutory Office Stoff neme above Paragraphs 50-51. The Councilor Poll Dell Esq., Clayton Lendhert Esq. Emby Tott Erg, Rebert Cetting Ir. Eng. Hunerable William M. Boller, JSC, collectively and independently returned to enforce these legislative enoutments, prescribed by manglates, all allowed only a perturehoning and ritualistic challenge under en Ommbry Hohan, in tel, 2023. These counselos and Julger, outing under the color of State law, In a conspirer to convict Plaintiff, and force a tried where he is an unamed participant in a sporting event, without the benefit of etterné countion, relible evidence, and proper challenges with zeal by countils as Plaintiffs Changron as the Constitutional mendetes

53. These defendents, upon intermetion and belief, Skill ful in their arts, Have used effective techniques such as hide and skele with evidence; to quall Plaintiffs and outside inquires

Into the case. Plantiff attorneys, the four above, mentioned in paragraph St, independently and collectively delayed Filing motion, all motions have been viracionsty and neglegently untimby Sportically have filed requests, motion of a Standard nature was latel or not filed (Speedy Inel Die Krocess, Denial of a Defense, Syprando Of evidence) directly ment to Subotage the fleintiffs tok botore a true tribinal inet Kengpo court could make sure mode of proceeding were properly conducted to this case. These deprivations were conducted under the Color of State law, meant to be deried through complicity, and Circumvention though circulorious methods, such as suppressing of Fourtable revidence, limiting instructions to obscure evidence, defentes and arguments. All ritualistic and weath give the Surface appearance of formist, in actuality anything but fair, agressence or even orthologists.

Sy Upon information and belief, the Dubrut Attorney John Plynn Ess and Acting D.A. Michael keene, were and aware of the custom and practice of suppression of evidence by the A.D. As in Eric County. In this high profile case their failure to train, Supervise these ADITS, his allowed the ADAs to Strangle over Plaintiff Staplay, Civil, Federal and State Constitutional rights to due Process, Equal Protection, Fair trial, Speedy trial, cliscovery. All whole ochy under the Color of State Colo through Zeel to punish &

55. Upon intermetion and belief, Hetative Michael Striegewske, of Churchtowaga Police Department and Town of Cheekhowaga, Illegally and intentity Blackmules Plaintiff, asking to deprive an Emotionally Disturbed flaintiff, asking to deprive an Emotionally Crimes, in order for him to enforce a TNO by tamply Court and Prefair from Order from Cheekhowaga, both active, against keering Bennotical Astay away order, usued against kears Benefield wis violated by the Detective and his schorts, when the Court had legally determined to be a larger to Plaintiff and their Children. Plaintiff teering for their Safety, turned him self in under the illegel Blackmail, Centum by this detective, under the bolief he would be able to protect his hids against his wife Plantiff not only come to the Court without counsel with his perents to the bolice Station and adjustent Courty so he could lever his keels side. Upon Dung

agreeded the restraining ordered effective from
Family Court, and reinforced the same order. Only
meling the modification that Plaintiff Stayaway from
his residence, and take their Children estewhere.
Crantered hearing was set in the over fature to
ehellenge Plaintiffs removed from his domicle with
the heads.

S6. Upon intermetion and belief, Plantiff Son went to the school, to pick up the heals a little Shy of 3pry, to make six they clit not go to the domile where his wife, Keerra thudgen Bernetrell, his late wife. However, the school refixed to abide by the Court order. Stating he could not puch them up as normal pursuent to his left with keens Beneficial instructions. The order of Prokehon Was froduced to the Cheektowage Detendents in Cheektowage annon East, they retused to abide by cler court order, While ochy under the Color of law & They instead called the School office, who cetared to call the Checkfordage Conf, as Mintiff request, rather he Called his friend, the detective on his provide cell plane, and then on conference call in the School Conference room to with he copoled the Checktowing

School to builde the Order of Protections, and send them bould to the lete kening beneficial who had an active restraining order to Stay and ay from Adambaneficial So and all of the children, that I weed of their Demide is After plaintiff obtaled by the Detectives block mail and ransom Schome, he reverted his perfort agreement, leaving Plantiff enreged, and allowing the children to so to the Rissin who was legally not allowed to be before now in possession of their Children.

Complicitors and conspirators, turdinentally put the School Shudents and Staff in a possible degens.

Situation, without the aid of a controlled environment.

Especially to the advent of mesistrophry and school.

Nesacers a Even the Tops shooting where plaintiff.

First common, police officer As non-Selter whom plantiff went to the function, had prefixed with the Governor, Hope, is musing from discovery and Exculpiting material was halled. This cutrageout conduct, meant to enrage course Plaintiff to commit a come so as to panish plaintiff for a felong, due to the publicity from a proported video of the alterceton, between Plaintiff and his late wife, keeps Essentially where their children were either not present. In youngest who was four

the other two were in Chelitoways Union East Schools.

The officers and detectives creative Zeal to proud Plaintiff for the incident plaintiff was arrested and state Federal and state Penal laws, constitutional laws, Statuting lows, Civil lights laws, White acting under the labor of State law, that any altegrally had disapired life, but apparently could be had disapired to results in the School. This is a visition of Due Power, was outrageous conduct meent to influt mental turnoil, on an already mentally offlicted individual to a fragle mental state.

the clegal morder, that the Plaintiff is alleged to be the perpetrator The lipinith is alleged to be the perpetrator The Laple working with the Divis department of Buffelo Scanhed Plaintiff I ower apartment runder the guise of a constitutional Search and Seizure. In reality to the Contany it was a Search seize and destroy to wordble evidence in Plaintiff behalf in the nature of Brady, Gritain Possers, Vilardi, Wett, Barley, Che 241.10(1)(a-u); CPL 245.10(1)(a-u); and Same is applicable to all other Search warrent in this case. Including cheatance

evidence in phine rewell media ecesumts, email
accounts, electronic Storage Devices and mediums, etc.,
even divorce papers plaintiff previously half filled
out, videos of wifes whipping their Comanth babyand
year of older children, by though, and thems
thown at them. The people have this cerulence,
but have intentionally suppressed and for clerthyael
So as not to show the langer of the unitary
towards their hads and even plaintiff himself.
Including her assoult on him.

any tral is had, and jury convinced plant if committed such acts, the Jury would also, if before them consider the imputes or actus ree; or mens rea, would'in been in Plantiff behalf, and would be defined by Detachies, and numerous deficienteies; tailines, and misconclust, through a chain of events from misconclust, creetive acts by the fearle and overzodowness and zeel to conside, through Black mail of fundamental right to be left about, secure in home, work, school, family life by the Whims of intividuals eating under the copy of these law, who are impartial. Their convincing of others to break the low, he had there plaint if and so parts favorable covidence, testing on the school of the contract of the school of the contract of the school of the contract of the school of the school of the school of the contract of the school of

the People working in convert with defente countell for the Plaintiff, have used counsels as a tool to avoid colling witnesses to support the Plaintiffs claims. In a letter to the People and Attorney Paul Dell Esq. and the count, Plaintiff complimed of his rights to witnesses, towever he was told, by counted, he would not call any witnesses except maybe an expert, against Plaintiff explicit right and direction.

Go Upon information and beliet, Plaintiffs

Typh to Compulsory frows, to have witnessed in

The favor, to have evidence brought for in

and for his defense. This technique, strawled

in smake and mirrors, is decreased the guiseof

Strategy and tackers by multiple definite countels,

acking where the Color of State law in Comming and

Fooily Court Eric Country. However, in order to obtain

a conviction, countels refuse to obtain any evidence

in the localed cases Sister Coses in Family Court Eric

Country with Shann M. Loudlo and his agents i Criminal

Court, Eric Country Syreme Court, Man William M. Boller,

Checkboxing Town Court, Eric Country, all dealingwith

Plaintiff with Kawira Bennefield, late wife, and

the flintiff, These violations are being those under color of state law, as well as the complicity. 62 Aprinto contract befiet, lannie Hudson, fending Administration of the Esta of the Lete Keer's Beneficial has filed suit against multiple agencies and town, detendants in Index No. 814386/2024, contending misconduct and workful deith Plaintiff is o' detendant, and who bleishift advised the Court, The Reaple and detine Coursel Haul Dell Esq Cezoding this new, Hagallet and Sister Case, and hand transft to be troph out to disclose were required to goodue Seil into confin , and that it was directly Tel Jest due to the allegation. They thoughted Such behet, and when thingthe addressed the the boller, JSC, in regards to the selecting the Julge, as hed the ADA, after he stated he dedot think it was relevant if the ADA thought it was relevants They seed not at the honorable Judger Bellers prompt to gare, Counted faul Dell Shoot selent, and let t flaisht to fend for himself, as he cafeel of grammal, attaken, in reme some title only I Am Misordard till under Conflue and Bridg sheferint and is newlow, under Ol 2450 (1) (K)(1-vis). This is done while these perties were

acting under the color of State law, in cloregoration of Plantiffs clearly established law and Equal Protection of law, with made of procedures violething Improve on the integrity of the Judicial oversight and system.

63. Upon intermetion and belief inorder tor this scandal and conspiracy to Continue, Hans William H. Boller JSY Enic County, working in consect with the Distrect Artorney's office, Cheeleforinge John Court, Elie County Fairly Court at the Cest, heering on Ochber 17, 2024, with Plantiffs tagily in the Controver Knowing and Deiny adurably Huntiff, that Discovery was miny, Bridy Heterial, Giglio Weteriet Baday, West, Vilerdi, Kasein, West material Was missing, transcript request timely made in two Coses, 15 two courts the trigged Countel program,
Itempt herry denied a proper and timely mental
Commetion based on allowable, not culted from illegel and complete suppressede information, the Paier, tgir triel, Equal Gatechon Wolston . Hun Willen Bolly, working with his co-conspirators responded to Klantiff complaints in a Stein, powerful pose prophased that

Country shoulding scaped these while eather.

That in any event, regardless of these would be prospored i changed, delegal.

That atrial will begin tomaldietely after a 2 day at most jury scientism. That the Chief Administrative Guidel in Alberry Wester this these completed immediately.

This was done under the color of State law.

SSC, continued to begate and bedat, the Hon Boller,

SSC, continued to begate and became a Included

without against fluintiff stability persphrated:

"You took a gun set, cheshed with your

where value, pulled her out, bleather

blains out in front of her heads, with

pieces of blood and guts over them"

This fightmany against the Plaintiff in open court

Shaned his importability brestings, and that he could

not be an arbiter nor referee of a trief fairly of

Hon John by this Statements, reflected Appearance

and taked appearance of impropriety, under the Kolor

Oil State law.

65. Upon information and belief, this is

Albany to conclude this cose; regardless of Constitutions!

Unlisten, On Feb 14, 1024, transmit obtained by an attorney i reflected that not only head fluinh to speedy trist been violeted, as of tab 14,2024.

But even the District Adamy: office book the.

Some position in their Hohan to Practice Psychiatric testimony; by notice of Hohan; and orelly in Court Collegeist advantage and advantage and advantage and advantage and advantage and point of fourth fluinh flow property as west, and information provided to full Dell Ese, this was done by all aforementation packers, and defendants while acting under the Color of Sate Law.

Plaint P , was intook into ECMC, CPSP/CPEP on Sept Is, Let , by the Police, due to mental III nest, alcohol consumption and being a clarger to other and hintelf, an EDP by way of MHC 941 Istard of keeping plaintiff backolon his history of Hentel illness for 25 years his entry into CPEP/CPHP almost (1) year earlier, due to a psychotic breakdown and being a clarger to himself and also I involving his late wites introlledy, or

so he believed. Heistli forest bld, ECMC Shiff not to let Plaintiff out, the was to unstable. Without permition from his tomby or let wife, begins Bennetrality two days, less then 72 hours. Due to Plaintiffs howary, they could'de held flaintiff for any number of resons ever more than 72 hours. Their policy Enstons, et were not followed and Plantit Suffered futher in jung, and occarding to the keeply danised his lefe wife is host at their children it the policy costoms wer followed, they were known the thepre prochus Castins, written or oral. ECMC Des liebte for eny actions proported and found by a jury to have committed 1915 and was malproctice foll allegedly in Eric County 66. Upon intermetion and belief, the flooright on the fravoir CPAV admittance, of ECMC Shaped for three days, threetening herm of himself and othersy thus this was not an wolated mental ailments and ELMC 8ht well owere of Plainth hurting, while

67, Hence, upon information, and belief according to the allegation flaintiff keller his

their Shiff were aling under the custom and practices

of ELMC huspitali

wife in a mental ill nest state, when he shouldby been hald in the Hental CIAP/CPEP. Due to the reglegarie, failure to supervise, wong ful, un professional scalular, neglectful, and the Before of ELMC Blue and as tom, Plaint II is alleged to have committed hernowy crimes.

68: Upon intermetion and belief, the Detendant An Nateth Coventer, it she wrote a mental aport, Which bould on abservations of a person, determined party were written by Siltigent people, from different pints of how , and collaced to make it seem like she wrote it If it was truly wroten by her or not, Frere We a conflict of interest, thus mefpratie , given the bid and importal report, Accordingto her Doisier, she not only worked for ECH previously, but under the opyred counted grogram, where Endy 10H Esq, and laker Cutting Is, Esq, and Abbert or Clayton Lendhart worked for one he attempted to fire, the Plaintiff, to prevent their from representing him. Thus, she wouldn't had an interest in concetting a Scenerio, to identify her constituents of ECIAC, and assigned counted program, and detend then as well Certainly, she couldn't be seen representing towardly, the accepted in this highly charged, Roblic, Political case is a

canal venue Any Evorable report would possibly, by all appearances people and profesion and her provide proches. This she would have had restant to the other defendants. But hinder petitioned abolity to get a briefly fair trief by such late report, while discrabing any we get a widnesses in his behalf.

Of Upon information and belief on the other hand, if she did not write the aport, Detendent of Greates, orely it was madified by a Scientiff hands. Then, it would also indicate schokage of flintiff detentes and evidence, to prevent favorble withester from being heard by the trient fact finders.

Deficientaies, in either case would not only be monumous, but further condence of Due Process Violation, light to fair triel, right to compulsory process, and other paneply of Federal and State January process, and other paneply of Federal and State January would in either case

amount to a conficer before any one of the defendant, or multiple intendents to grewent a scandal and the forth ong texts relevent to quelt, ingence or other tackers arecred Lively or indically within these mount pepel. 71 Detendent, Sheritt Joh Conrale, and separately Chief Jeffery Kortman, at Eric County Holding last both are employed, agent at Ere County To their Superview role, they have the responsibility to over see their subordinates. 72. Defendants Short Gorain of Ene Goody, has allowed the Plantiff (ight hoccess the County) to be intraged upon , by taking the Mointiff legal work, returing to give Klant Henough time in the Low libert The either water and/or convertes play, is allowing trase unconstitutional policies and to Costons. The defendant, Shelitt Green, has been apply regligent in tailing to releggistly Supervik The Subschules who by taken Hentito Paperty, lead documents needed for multiple eighter cases. With regards to the Lew Cobrag officing Plantiff right to access the court and petition the court for seelies of suevenes and due posess. The Short Garcie, deterdent know or should have leave the

policy of limited Low Cobian access, is invitacent to adequately allow plainth to alabel against and filing documents with the Court, tother, that only one hour a weeks would be injufficient to meet these needs, nor two or three hours a week to file redifficeent, and file timely document properly for courts consideration, at the fault of Deputy Bremen nor Deputy Domach, who are bound by seed taple.

Defendant, Shorth Garcia, of Eise Winty, have been wise of this deficiently in the Continuity program and include whe access to the Courts to supervision he know if this deficiently and failed to inform, train, subordinates on policies designed to avoid Violeton of Contestional right, nor fix defective fulcies, costom and practices, writer and for order

The Chief Hertman, Detendant directly was and therestely was end the fortherestely indifferent of Plantil need to access the Court timely need to have his legal documents, need of tree corpits, he are Special class to the last library and mederals. He also was owner, with the limited access the need to

here all coses necessary in cell, quen musing Les Wirey sometimes weeky at a time; I lent forguty with between coursed upon intornation, shord with define counsel the the color of State Con. Both Goras Kathren, his acted at a long arm at the bedwerth song of relation by being isolately by the copy, I deininha at Plantite confidential made The Copie methine, is used to correct intermetion to the traple as well. He just t her been in bush with Chief Kaltmen and complined ownerous times though interned complaint Britaine powerlist, exhauting by administrative remalist, to the highest level However, Kelman his retricked to take action to address their defacentus of well flantith her spoken with tout the Carrelly his compleints, only that he need to File mations, not the traver / Plaintiff and Ceuth allow this touting through Walker excused from Contrhitopel requirements projeture, working in concert with the Prosecution office, to Granwerk Plantith City under Constitutional, Statutory, civil right to present a detente, has and is fact of an ongoing compracy, while they

Out under the color of State (as) to Sato tage Plaintiffs ability to Defend against the yes and allegations

Plaintiff informed Chief the timen, chart the limited of corner to lew library ineffective count problems of corlor paper. Keetmen referred to certify there instants and problems to give free copies that instead, forces copies to ghard instead of combon paper, in the advent of limited access, fetheries comet get to mely copies, enough time to hope documents I exibly.

One such motion was refused by the Eric County Supreme Court according to Horapolic Boller.

Supreme Court according to Horapolic Boller.

Motion for transcripts, head in about April 2003.

The Upon information and belief, Chief

He then is working with the Eric County District

Attorney Office, and other to defined to

Frustrate legel proceeding, and prevent timely filing

under the lolor of State low 1

IV EXHAUSTEDMOFLEGAL CENTEDIES

27. Plantiff used the Consider powedure available at Ene Country Halding lenter to try and solve these problems deality with Ectre.

The grieveness and complaints relating to this out I plaintiff his used or attempted to use every level of appeal. Plaintiff property with active legal documents, grieveness, complaints, decision is within these document and Property, that ECKC and their cohorts conficients, copying unashing to set of school of five tell, in an arbitrary, copying unashing while documents to give, when where, how to provide them, ofter the filtered though, in their GT secret location of his property, choices mede unitatively.

herein bord on information and belief all parties involved, detendent otherwise not stated, there is no plan adequate or complete remedy at low to redress wongs in therefore, with time paragor the evenus the detendant being in tandem. The evenus in Ene Country Supreme Court William M. Boller, J.S.C., Eve Country Supreme Court Swan M. Coulle.

petitioner / plaintiff from filing and/or hitigating clear
ineffective counted violation, systematic toutions of
the State under and through invidual discriminations
and Equal Potential Wideham the William My, Roller,
Ist requiring Plaintiff to so through counted
to file motion, to and does the court which
for the motion was tent through mail was not told
with court, and in the records. Circumvention
of adequately addraining weed and hardling the
mation to counted Trott and Cetting Tr,
clateral in this case. Similarly similar pricedure
was used in toning last, by the last Benging
all Pas Se motions, to prevent appeals and
preservation and exhaustion:

Lihershor not effect total, is being precluded by ferrily and Commind Court of Eric Countries

Culting the Plantiff in this case, is being classed his right by the Collaboration of Co-compitators, to prevent adaptet, fair trial judicial processes, and the People putting hundred of Cohon I (Address of rish due to police achine with and waler the Director of School Checkens of School Address Violata classly established bedard and State husbarated

right to Die procest. Thereby, through these overves, the Defendant were attempting to hile suppress clear and inequiviced Histordant by all the Defendant. These violations in this care structural procedural and urged by the people to hide their violations.

80. Upon information and belief, the Notendents can only hide their evidence of cleer mis wordent by forcing a trial and Suppressing all favorable evidence, and, cuidence lesding to other evidence A. reviewing Court would only review exhaustel issues and claims. Which the feople used detendant / Pluintiff own countels to retard, chill, frustrate, impede, thwart preservation usines till the Coursprechales, and forces Successive retrieb, after destruction and manipulation of evidence towardle to the occurred. There by , any motion would be claimed to be Plantiff atturneys defente tectris and strategies. Thus certissise, must be deemed extravely

VILEGAL CLAIMS

a cesult of the wongful, reckloss, negligent, and careless acts and/oc omissions of the Defendents Plaintiff has sustained significant damages, including but not limited to unconstributional detainment, pain and suffering, psychological damages, mental and entional pain and suffering, last wages, last of tube liquort and suffering, last wages, last of tube liquort and survives, economic loss; and according to the Rople, wrongful teeth of his loved wife, keaira Bennefield, loss of his son, family, step children I Plaintiff specifically pleads the struck and the struck on causing his wifes deeth in front of his children I

by reference, paragraphi 1-67. 83, The clear violetions of misconduct, suppression of evidence, denied of access to the Court, frustation of legal procedures, indifference to medical/Mental needs, unsete practices, Violetin of Weintille Statutory rights, Controbationel Right, Civil right, violetisis of the closely established tederal and State Constitutional amendments, Statutory law, Civil lights law. Including, Heintitt Adam Benefields Sr. Cypts and Violeted United States Constitution, First, Swith, Fifth, Sixth, Eighth, twiteenth; Kight to petition, the government tor redress of ecievenies; Right to the fecule to their person, houses, pepers, and effects, against unresipable Scirches and seizures hall not be

probable cause supported by oath or attrimetion, and forticularly describing the place to searched, and the fearons or things to be seized; the shell any person be subject for the same of feare to be put twice in jesperaly of life or limb, nor shall be compelled in any criminal care to be a witness against himself, nor deprived of life, liberty, or

Violeted, and no warranty shall issue, but you

property without due process of law, Excessive boil shall not be required, not exessive times imposed not coul and unusual punishment inflicted, the State shall make ocenture any law which shall aloridge the privileges or immunities of citizens of the Winted States; nor shall any state deprive any person of life liberty, or property without due process of law; nor deny to any person within its juindution equal protection of the land. H. Y.S. Constitutions of nostidentially incorporates the feeleral constitution in this paragraph, Article one, sections five, six, eleventh, tourteenth; Civil light Law 8 and 12 (gight and twelve) the other Statues and Yaws a verred to direitly, indirectly which talls under the todesol and Itate Constitutional provision to Due pocess and Equal fatection.

'84. The plaintiff has no plain, adequate or complete remedy at law to redress the wrongs described herein Plaintiff has been and will be continue to be irreperably injured by the conduct of the defendants unless this court grants the declaratory and injunctive relief which plaintiff seeks.

VI. PRAYER FOR RELIEF
IDHERS FORE plaintiff respect fully prays
that this court eater judgment granting
WHEREFORE, plaintiff respectfully plays that this court enter judgment granting Plaintiff:
8) A declaration that the acts and
Omission described herein violated plantiffs (ights under the Constitution and Lows of the
right under the Contraction and Lows of the
Clorked State
86 A decleration that the acts and omissions
described here in volated pleintiffs right under
the Constitution and lews of lew laster conder
Ste A decleration that the acts and amissions described here in a water plaintiff rights under the Constitution and lews of their Contractions and lews of the Contractions and the Supplemental Jurisdiction , etc.
87. A deeleration that the nets end omission described here in are considered and
Omission described have in are considered and
determined to be outrageous government conduct that "Shocks the Considerice in
conduct that shocks the considerce in
Violation of Plaintiffs Die Process Rights Federal and Aliy S. Constitutional Provisions and Civil
and N.Y. S. Constitutioned Provisions and Civil
States on 1. O a Dor answed to

88. A preliminary and permanent injunction

No. 01849 -2022 entitled fearle of the State of New York Us. Adam Bennefield, Erie County
Signeme Court; Family Court Docket No. HA 1062420 V-10500-22, et al Erie County Family Court entitled
In Matter of Adam Bennefield Dr. et als

89. The Basis for the preliminary jurisdiction, Is without this Courts help, Plantiff with befored to Triel without witnesses in his behalf, without a defense, in his behalf, without offense assurance in his behalf, without of feature assurance in his behalf, without due process in his behalf exceeding the bounds of Speedy triel, and there would be a manifest injustice, miscarraine of Justice and violation of Plaintiffs tundemental Constitutional right. The Court, in confunction with the other defendants of Ene Country, are using prochie by the detendent and noney denings
will not fix his invoies, clone. Without this Court help, Plaintiff ability to defend at trial and Plaintiff would be irreportly harmed. Upon tright before this court, Playsoft would likely proceed and sweed at that before federal Gout a Playoth P Will suffer more if the injunction is desired than the defendent will suffer if it is granted, Further,

Hat prevents the Defendants, Henerable William
M. Boller, JSC, Eric County; Honorable Sharon
M. Lovello, JFC, Eric County; District Attorney John
Flynn (Action District Attorney Michael Recomposi
Eric County, their Successors in office, agents
and employees and all other persons acting in
concert and participation with, from Legislined
from I taking any Further action, prosecution on
I relictment No: 73197-22/001, ECDA Legacy
No. 01849-2022 entitled Reple of the State at Hew York
vs. Adam Benneheld, Eric County Supreme Court;
Family Court Docket No. NA-10624-22, V-1080022, et al, Eric County family Court, entitled In
Matter of Adam Benneheld Ir, et al

Order, preventing the Defendant, Honorable William
M. Biller, JSC, Eric County; Manorable Sharan
H. Lavallo, JFC, Eric County; Manorable Sharan
H. Lavallo, JFC, Eric County; District Attorney John
Flynn Cherry District Attorney Hickael Kent of
Eric County; their Successors in office; agents
and employees and all other person acting in
concert and pertricipation with transfer, in
Complete and further action, prosecution on
Indictment No. 73187-22 foot, ECDA Legary

a pretiminary injunction will serve the public interest in the Truth-Sceleiny Function and fact finding Process, exposing the outregeous governmental Conduct, and foster respect for the integrity of judicial processes and checks and belance system

91. For the Same ressons the Plaintiff Scelu a ferment and Preliminary injunction, Paragraph 73-75, the plaintiff reclieges and incorporates by reference into the Request for a TRO (Temporary Restraining Order) against the Defendents is Pragraph 73-75 Flori Louille, JFC, Hon Bolle, JSC; D. H. Flynn (Acting DA. Hickory Kegre) all persons extra in concert with or pertrupation with them, waiting for a preliminery injunction Would result in immediate and irreperable injury for and damage. All turker proceedings unde Indo # 73197-22/001, ECDA Legery # 01849-102) Reple v. Benefield; Court Dachet # 44-10624-22, V-10504-22 et al, of Ene Country must be ceeked and desisted I muedielly, to parewellideric, testimony, rights, Dispery Cody setticky Giglio Makerel, the Right to a tair trad betoea tair tribined, and to prevent Spoilation of evidence and tither conspiratorial

July of outrageous sovernmental conduct, a Due locus isulation, including circultorious methods.

92. Plaintiff Seeks a Preliminary 16 junction and temporary restraining order against Erie Country Shrift Ooks Gorcia, and Chief Heltman Erie County Holding Center and each of their officers, egents, employed, and all persons acting in consent with or perticipetion with them requiring them to Seturn defendants/Plantiffs property including legal documents, notion paper work, cakes, Privileged correspondence and with gooduits, et taken from plaint, on but 6/26/24; to Stop interference with occess to the Courty including but not limited to capying of plaintiffs Legel mail, privileged correspondence, requiring Plaintiff to be given at less ten (10) hours weelly acces to the courts, through Caw Cibrary access; Allw Haistiff to fendant legal and what documents with temply visitors to attempt to mest court deallines, requiring the court to allow free legel Copies, postage, Speciel handling Cost to meet thek with deadlines, imposed In conjunction with parallel powerdings, sister porceelings

1) Plaintiff seeks a preliminary
injunction requiring the tean William Hillsoller,
JSC. from forcing trial to begin without
due Process and Equal Right Constitutional
protections, against clearly established tederal
and State constitution and tows, which would
result in irrevocable from to defendent and
the interest and integrity of the Justice System
and government.

injunction against the Defendants than Storm It. Loudle, requiring the court to inform the Court why they we punished the Children alleged to have been victimized, and defendants parent, the Children Poternal Grandparents. From Seing each other, invisition of clearly established school and State Constitutional Amendment and decisional Jawi, punitively, and icrowly, capricionally and a complete about of discretion.

Acting D.A. Michael Keene, D.A. Frank Clark, All A.D. Ar involved with this cake, Hen. William Boller all of Eric County, to bring forth evidence

Why in violation of Equal Protection Right and Due Process right the People and Court terted to point detendant with the Discour, Brills (Sigla, Roscio, Vilerdy, Boxley, Wett, Eflette (1) (k) (1-Vi); Cl2 25.20(17 6-0); CP (245, D) et. Seg, and allowed such pervision and frastration of judicial possessed by treating Plaintiff , Atlan Generall, and his right to listed shower is treated completely uniqued to other defendants in Eric Gung. Petitorer/Plaintiff COC (Cartificate of Compliance), plaintiff his occurrentated Various other Beten look Cocs, but the Court and Plaintiff afterny's refused to put it before the court for comparison and addressing why plaintiff compar get the serve treatment of other detendants, when addressed beforethe Court Ochber 17, 2024, by Plantiff without the benefit of his counsel that was on the Side of Plaintiff, Plaintiff was left to address we know by himself unstead of Atty had Dell as his chempion. The Cont, and the troopse todal in their dust role of well to poket Plaint H right, No Jist Fration Was give, With the exeption, is noted should be cover than earlier. declaring judgment, explaining that Plaintiff Dentited to the Potential and to the Potential and Equal Potentian Dr. U.J. Contraction / Hy

Constitutional privision and civil right laws
Course that whather a dotardant / Plaintil (b)
a peinois clime charges against him of not,
a horizon crime charges against him or not, he is still entitled and its required under Due house and Equal frotestion, to be provided with Equal treatment of less available
with Equal tresment of laws available
defences, Stetutory lows and equal freedment,
of \$ 5,000,000 against each defendant,
of \$1 5,000,000 against each defendant, jointly and severally,
98 Pinitive danges in the amount of \$1 10,000,000 against each defendant, jointly and severally
\$1 10,000,000 against each defendant, jointly
The state of the s
99. A juy trial on all issues triable by
juy, Juy
100 Plaintiffs (ost in this Suit
1

201. Any additional relief this court deems just, proper, and equitable,

Dotal: All Benefill at. 22, 2024

Respectfully Submitted

Adam Besnefield, 44965

Erie Country to belig Center

40 Delower trenue

Lotato, New York 14202

VERIFICATION

I have read the foregoing complaint and hereby verify that the matters alleged therein are true, except as to mether alleged to be in information and belief, and, as to those, I believe them to be true! I certify perjury and penalty of perjury that the foregoing is true and correct

Executed at Buffalo, and New York

On October 22, 2024

Adm Benefield of plaintiff

EXHIBIT LIST

A	TOP, Stay way from Issued against Defendants Wife
В.	TOP Refrain from against Defendants Wife
C.	Indictment against Adam Bennefield
D.	Intro letter assigning Emily Trott Esq.
E.	Transcripts dated 41113
F.	Pro-Se Motion for Transcripts
G.	Letter from Defendant to Court and Counsels Discovery violations dated
Н.	Letter from Defendant to Court regarding counsels inffectiveness dated 25504
1.	Letter from Clayton Lendhart dated Si Bi 23
J.	Letter from Clayton Lendhard dated 11/3/33
K.	Family Court No Pro-Se filings
L.	Plaintiffs Pro-Se motion for discovery, transcripts, visiting rights etc;
M.	Letter dated dated 7 / 11/ 1/ to assigned Counsel Program
N.	Transcripts dated

Untimely Omnibus motion by Assigned Counsel Emily Trott and Co-Counsel Cutting Jr.

Ο.

- P. People COC, Adam Bennefield, dated November 29, 2022
- Q. People COC, Jeremy Griffings COC
- R. Sample Omnibus Motion
- S. Transcipts of Cheektowaga Proceeding, Unavailable, People wont provide
- T. Laawsuit Wrongful Death lawsuit
- U. Feb 13, 2024 Transcripts
- V. Motion to Preculde CPL 250.10 late notice
- W. Police 9.41 Complaint
- X. Purported, Dr. Natasha Cervantes psychaitrist report
- Y. Dr. Natash Cervantes Dossier
- Z. Plaintiff Pro-Se Motion for Transcripts dated 3/23/23
- AA. Altered Transcripts by the People
- AB. PRO-Se Motion for

In the United States District of	Hew York
Adam Bennefield, Sr.	
Plaintiff,	COMPLAINIT
V	CIVIL Action No.
Honorable Judge Eric County, William M. Boller, Jic, Individuel and in Official Capacity;	
Honorable Judge Eric County Sharon M. Lovallo, JFC, Individual and in Official Capacity;	
Eric County Assigned Countel Program in official and	
Individual Capacity;	

Official and Unothinal Copacity	
AD.A. Gine M. Gramagilia, Ege- Official and Unofficial Specify	
A.D.A. Justin H. Coldwell, Esq Official and Unofficial Capacity	
ADA Colleen Curtin Cable, Esq. Office and Unoffice I Copainty	
District Amorroy John Flynn Official and Onofficial Capacity	
Acting District Athorney Michel Keene (StIN FYNY) DA. Office and Unofficial Copacity.	
Detective Michael Striejewske Cheakbowaga Police Department In official and Individual Capacity.	
ECMC (Eric Cowdy Hedrical Center) In official Capacity X	

Principal Helissa Hikhell Cheeletowage Union East School Official and Individual Capacity

Ast Principal Stephense Anderson Cheektordage Union East School Official and Individual Capacity

Ast. Principal Julia Handle Cheekshunge Union Est School Official and Individual Copacity

Receptorest Jane Does Cheeptoring Union Est School Officer and Individual (apacity

Recotioned Jone Dee Check Andaga Union East School Official and Individual County

Searty Guel, John Does Cheektowage Union Eash School Official and Individual Capacity

The State of New York	
The State of New York official Capacity	
Checkbourge Union East School, Official Capacify	the AAT or Anomales make a supplement
School, Official Capacific	
	which will be an all distributions a related manager and
Town of Cheek to Way Erre	THE ST. THE ST. ST. ST. ST. ST. AS ASSESSED, SA.
Town of Cheek to Way Erie County, Official Coperity.	~
	The section of the se
City of Buffalo Men Yorly Eric wordy, official Coperity	
Che way, otticial agreety	
Athron Enl Tat Sa	
Atturney Emily Trott Esq. Individual and offices	
Gracity:	
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Approx Report Cottine Tr.	St. of State of the State part States & S. S. S. S.
Approxy Respect Cutting Ic. Esq. Individual and otheral	** ** / - * * * * * * * * * * * * * *
Cpacify.	
Attorney loy/ Dell ESz.	
Individual and official	· moreon a company of the
Capacify	
	~~~
Attorey Clayton Lenhardt, Esq Individual and Official	
Cefacity:	

Dr. Ann Matasha (ervente)
In official and unofficial
Capacital
Sheriff John C. Garcia
For chafficial and Official
Copacity
Chief Jeffery Hartman
Grevenie Cordinator. En è
County Kolding Center in
Unofficial and Official
Capacity
X
JUNISTICATIONS AND VENUE
d. This is a civil authorized by
42 USC, Section 1983 to reduce the
deprivation under color of State law, of rights
Secured by the Constitution of the United States
The Court has jurisdiction under 28 USC 1331 and
1343(a)(3), Plain Fiff Seeks declarage relief
photosot to 28 USC Section 2201 end 2202.
Plaintiff's Claims for injunctive relief are auxhorized
4

by 28 USC Section 2283 and 2284 and Rule (es of the Federal Rules of Civil Procedure. The Court has supplemental Juris diction over plaintiffs State Law Claim under 28 U.S. C. Section 1367.

2. The Western District of New York Is an appropriate venue under 2845 ( section 139/ (b)(2) because it is where the events giving rise to this claim occurred.

I PLAINTIFFS

3. Plaintiff, Adem Bennefield Sr, is and westert all those mentioned herein, resided in the State of New York, Eric County, the is currently confined in Eric County Kolding Center, Eric County, State of New York.

## II DEFENDANTS

4. Defendants, Horosable William M. Boller, JSC is the Judge of Eric Country Supreme Court, Administrative Judge, handling and Precising over People V. Atlan Bensifield the detendant, Ind. # 73197-22 1001 and is responsible for overall operation of this case the is sued in his individual and official capacity.

S. Defendant, Konerable Sharon M. Lovalle, JFC
is the Judge of Erie County Family Court, handling and presiding over Parallel Cox, In Matter of
and presiding over forable Cose, In Matter of
Adam Bennetical JC, Docket # V-10500-22, Docket # NA-10624-22 et at and is responsible
Jochet H NA 10629-12 et at and is responsible
tor overall operation of their coses. She is sued in
her individual and official copacity
6. Defendant, Eric County Assigned Council Program, is the overseer operation of Assigned Council in Eric County under its juris duction. Assigned Council Program is swed in its official and unotheral Capacity.
fragrem, is the overseer operation of Assigned Counsels
in Eric Gunty under it juris dution. Aguernel
Council freggen is sued in its official and unofficial
Capacify
7. Deterlant, the State of New York, W
responsible for overseeing all of there employees
Over Consider State Spiniord program, and
is swed in its official Cofficials. Men fork
The second secon
8. Checkbringe Union East, Defendant, is responsible for overall operation of the Principals Assistant principals, Clerks, Reception ist and welfore of their students. Checkbringe Union East, is sued in its difficiel capacity.
responsible for overall specifies of the Popular
Assistant principals, Clarks, Recentionist and welfare
of their Students Checkbowage Union East is
sued in its official capacity.

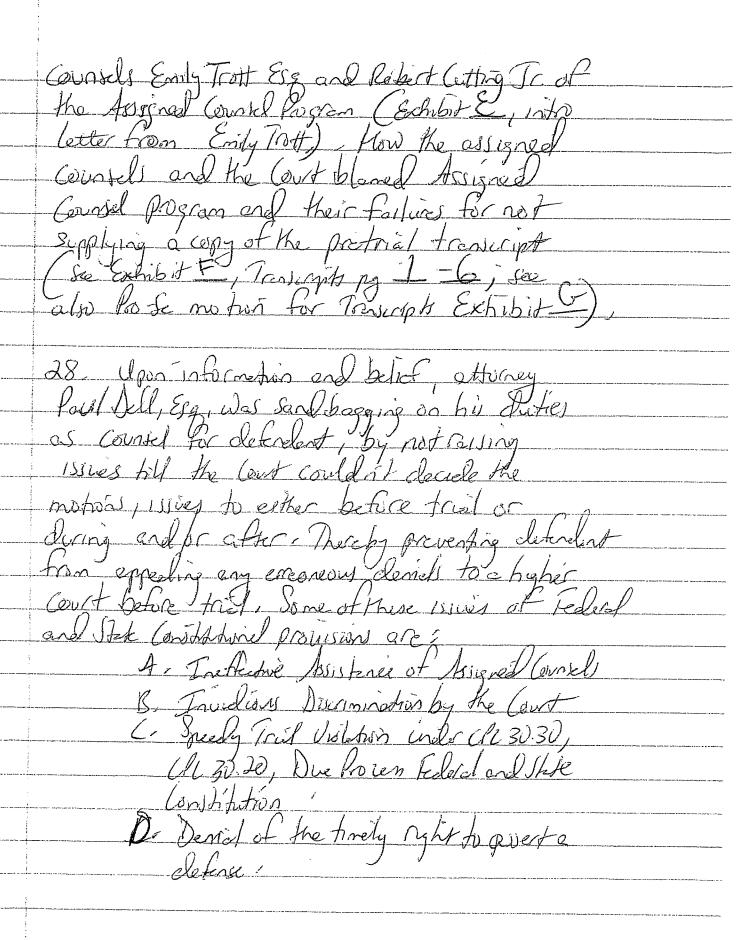
	9. Défendent, Helisia Mitchell, Ranciple of
TO do not a 14d word in the	Union East of Checktowage Lor Jane Del, is responsible for the welface of Shudents, and over sees the
the surrounding has long the passagency	for the welface of Shudents, and over sees the
e vice de desemble de la color e vice de la color de l	Schools staff. She is sued in her official and unofficial Capacity
- A - A - A - A - A - A - A - A - A - A	
The state of the state of the state of	10, Defendant, Abustant Principals of Cheelstowing
	Claus East, Stephenie Anderson / Jane Doe Jane
on the frances and a ventering a	Julia Hameli [Jane Doc], & Espansable for the Welfare of Students, and oversees the schools
e e t d'étic lièces primate res _{crité} aut sus	Statt and welfor of to land the use I silve
to communicate destroyal and design to	Official and unothicial capacity
* **** ***** * ******* * *****	11: Netendent, Security querd I Take Des Tot
F s. of Million, I be a 13 Work flow State gas	11: Detendent, Security guard I John Dee Tot Cheshowage Union East, is responsible for the Welfer of Staff and Students. He is swed in
	his office of Staff end Students. Ke is sued in
	his official and unofficial capacity.
	Defendant, Town of Cheek towage, is responsible for the overall operation of Town of Cheek towage compleyers and residents under its Jurisdiction, Town of Cheek towage is swed in the official capacity,
and the residual designations and	for the overall operation of Town of Cheektowage
MA WHAT WAY STORE TO MAKE	Town of Cheektowage is such in the office to
- the - the training or the	Joseph January,
along the following case from page to deposition	13. Defendent, The City of Buttalo, is responsible for the our all operation of the City of Buttalo, employees
	To the overall operation of the City of bottalo, employee)
	7

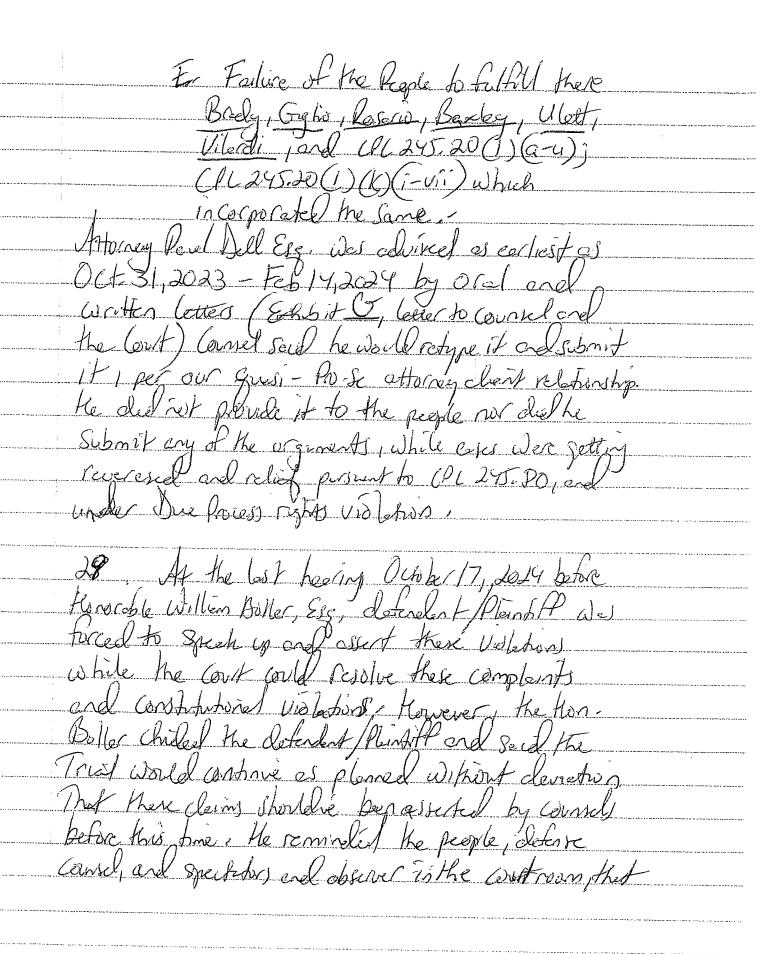
and lesidents of the Cityot Buttele, Bupple City,
Is being such in its official againty.
14. Defendants, Attorney Emily Trott Ess and Attorney Robert Cuthing It Ess, under assigned
Aforney Robert (uthing To Es under asis now)
Counsel Program; And to the Indigent Person, in
their capacities, they failed to perform duties
by law as consilor in Ene County representing the
defendent in his criminal and constitutional
proceeding rights. Trott and Cuthing Ir, Esqu ore
both such in their officed and unofficed
Capacity
15. Defendant, Approxy Paul Nell Esquestioned
15. Defendant, Athroney Paul Dell, Esq., retained Counsel, in his capacity faled to Potent defendants
Constitutional Pendemental, Statutory rights in the
Comiel powelly, Erie County, Pair Suels
Cominiel pocceding. Erie County. Plais suel is botho official and unofficial capacity.
Esq. attorning of Cow, facted to Poster defendants Constitutional, fundamental ryth Statutory rights homes English, Cityl rights in civil case In mother of Adm
Esq attorney of Con, Forland & Polis debendant
Constitutional findemental right Statutory Cishits home
Eight , City I ruht in civil less In nother of Adm
Bennefield in Family Could Exic County He is Civil in
Bennefield in family Court Eric County, He is sued in both official and unatticial capacity.
8

17 A L. O. L. O. L. C. 11
17. Defendents Ryan D. Haggerty, Esq Athony ADA and ADA Gines M. Granaglia, Esq Athoneus autore so the bab If of the D.
the and ADIT Gines M. Olomas lia, Esq
The state of the s
County Commel Court, faced to perform dutus based on clearly established Federal, State Constitutional
Coret on clearly established tecleral, State (and troubine)
portion, Could lyte (an) Statuting Cong they toth
formen, Civil Kykh (a), Statuting Comp. They tothe are sued in their official capacity and unothicial
Cafecity.
18. Detendants, ADA Justin H. Coldwell Esq.,
collan (who lead is the court of the
the dehalt of the bearle the County Coming Paint
tailed to perform cluber band on clearly at bluball
tederal State Comparational Dalling Vill 1 9 a.
law Statutory Low. They both ere swed in their
Law Startutory Law. They both are swed in their
19. Dotordant Acting District Asporary
19. Defendent Acting District Asporage  (D.A. John Flynn) acting on the Beheff of the  People, Eric County Countried Court who trains, supervises!
teopher Eric County Court Who trains, Supervisers
the effect of the country control of the forther
Lights were valeteel, we I spaily now hook and I
not supervision the subordinates and has teded to remedy
the Widerun based on clerch extablished tedal
State Constitutional provisions, Coull Rights Laws,

	Statutory laws They be to a O to
and the same of th	Statutory laws. They both are swed in their official and individual apacity
********	
	20. Defendant Hickael, Dedrive, Charletowaga Police Department Town, analys Town of Charle towaga, in individual and Official Capacity
The section is the part of the part of	Theoletonaga tolke Deforment lown, and/or
management of the management o	Official ( 1)
	The Cofelity
	31 Defendent & Co ( and HAD') CA & COCO!
	CPAP of Erie Country in official Capacity
N. Annahir State State of Stat	J. Offin (1)
	At. Eric County Box Asspireation (ECBA),
manda il prop il lauto sal, specimino prop il di	Seterdent Elie County, tailing to Properly trein,
allen il E V listen. delle le den e un la laprante	Supervise employees, bellowing unconstrational
At AMERICA SERVICE THE SEAS SERVICE SE	policy of custom to continue in their officeal
* 100 00 00 00 00 00 00 00 00 00 00 00 00	Seferdent, Elie County, today to faperly trein, Supervise employees, allowing unconstitutional Policy or custom to continue in their official Capacity; due to the todaise of its employees.
The state of the s	23. Each defendant at all times mentioned
	in this complaint, acted under color of State law.
	The source of systems.
	III. FACTS
	24. Relevant herein, upon information and Delief Since Sept. 28, 2022, a physical alter cation took place between the Plaintitl
	Wellet Since Sept 28, 2022, a physical
	TITE cessor took place between the Plaintill

and his wife. Due to a video posted by Plaintiff
Wife of the house where Plaintiff in Stalled the Video Survellance system sonline. In allution
Video Sevellance system jonline. In allition
The media tom and trenzy, a general
conspirary to identify all relevant parties began, and since has continued
and line has continued.
25. Plaising 0110
25. Plaintiffe children was utilized as
a form of Cansom, after plaintiff got out of CPEP/CPAP of ECKIC, a TOP was issued in his behalf as with lace on the CE & Line
in his behalf agaick lais of CC 6 171 H
by family Court of A organia ( Delos form)
Top was issued assault his wife soulered and
in his behalf against his wife (Exhibit / 1) by family Court - A previous Refrain from TOP was issued against his wife soweral munths earlier (Exhibit B)
initiated Ochber 5,0023, has went an for
initiated Ochober 5,2022, has went an for
Over two years (Industrient Exhibit C). The Presiding Judge is William H. Boller Howable
Tresiding Judge U William HP. Boller Hanorable
JSC (Ere Gurty)
27. AL the Lit Cont-1 - Carl 12
2024 horize than 61 () it we find of Ochiber 1/
Countel Paul N. Il See C. C. 11 Months
27. At the lest const hearing of Ochsber 17, 2024 bosone Kanarable William H. Poller, Defense Counsel Paul Dell Esq. refused to cellers the court orally in regards to ineffective essistance of original
J J J J J J J J J J J J J J J J J J J



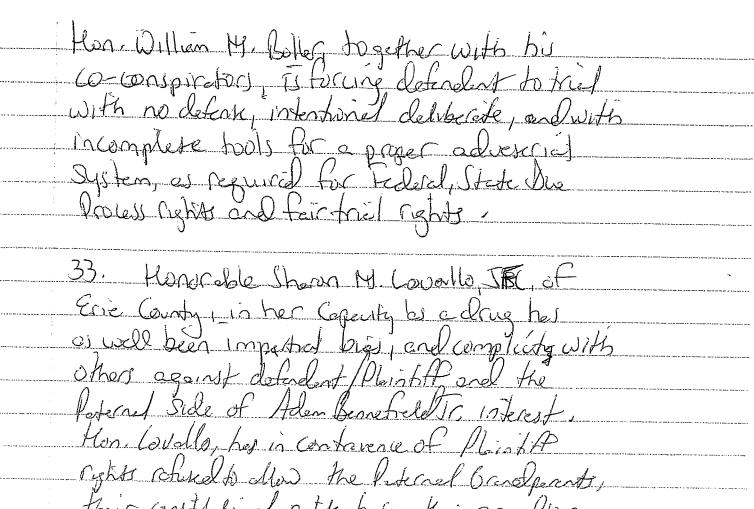


regardless of any rights violation. The tried world not be aftered, delayed our prevented. Plantiffs temply was in the court norm abserving end can after to the Same, if the transcript aren't complete

30. Plaintiff herein, also regulated the musing discovery be brought to the defendant Plaintiff for the record and every a tair tried. The Judge How Boller, Was unwilling to regular these Heterial to be produced. Upon Information and behing the Kin Judge Boller W. s and is not only important, bias, but is interested in keeping the record clear at misconduct by officially elekatives, to Asia deterk compless, the fair tried can be had, as he is the administrative judge and their pressure from Bitains, Agencies to get a conviction and least the Official Story clear of the Truth and Feet, finding process.

31, The Honorable Trage William M. Maker, In his countroom to continue, even in the waker of violations Since 2043 (Exhibit to letter to the Court Complains of defense counsels the type assigned

3h. Upon information and belief, the



their constrained right to be their grandfor,
to break the relationship chain and punish his
Side of the family for Plaintiff, leathough deged
mis deed, who chegedly collect into question her
three as a Judge and her decisions, by the

Plaintiff, Public and Domestic Violence agencies,

due to their belief of the happles version and

34. Upon information and belief, Hon Lavelle, in Wishing with the Court officials have convotted techniques to Void and by pass defendent / Plaintiff

Constitutional rights. By helding protectings in Chambers. Officially telling counted for supply Plantiff with transcripts and clip covery.

Yet off the record having counted Lexibility along as werry, not pounded is covery nor treatured to prevent the record from being expended, deprove defendent of the tools to dispute the allegations, and prevent him from using the biseness and conspiracy in Supreme Court of Eric County before them. Williams M. Biller.

35. To prevent defendent Meintiff from expending the record Mon information and belief the Court

the record Upon information and belief the Court
has Spok with the District Attorney of the off
the record through ex path convergetions. See
(Exhibit I and Establit —, Cetter from Coinsider
feedhards, indicating some, to prevent contained by
testimony of Some witnesses). This was another

Circumstrains methods of by passing cleteralent

Plints right to clarify the Courts as well as
his witnesses. Some as then boller, the debality

Plants detainent

36. Petitiner /Plaintiff also tried to file a motion, but with the Court prose endposistion,

It blanch the motion for transcripts, discovery Visiting right et on a unconstitutional packie at bonning to fo tragent who have counted (Exhibit K , letter from (evert) Se cho Plaintiffs Parte motion to the Court (Extribit This was done to circumvent evidence coming to light, Consel to Howed with a destre refused to respond for in general did not provide the requested, to deprive deterlant / Plaint IF petitive from asserting his constituted rights to defend against allegation and the penuply of other rights. This, is a continued violation and a conspiracy with Syrane Cont Boller, Huns 084 trid countly and the Dutret Attorneys office with the other defendants in this

Assigned Cornel frogram, designed after Gicleon

U. Wainwright and Griffin a Illinois, is for indigent

Clefendants: Lewigers are assigned and are to

give effective assistance. They are to train,

Supperarie yes effective policy and cushims, that

was all lacking in this case, for Attimens;

Early That Esq and platest Cutting Ir. Esquend ony
other attorney; representing the Plaint Phin this
mother. In their capacity they failed to over see
Tratt and Cutting Ir. and refused to provide.
Plaintiff with information to provide evidence
of ineffectiveness, as questions or use (see Exhibit.
M, better to Agency Erie Country Assyrid Countle
Program). The agency sho refused to pay for
I resscripts or a timbly mental examination;
according to the Court (Tangerith dated 4 / 11/23
Exhibit N; and Emity Trit and G.-Coursel
Cutting to Omnibus Notion, that was untimbly
Exhibit D

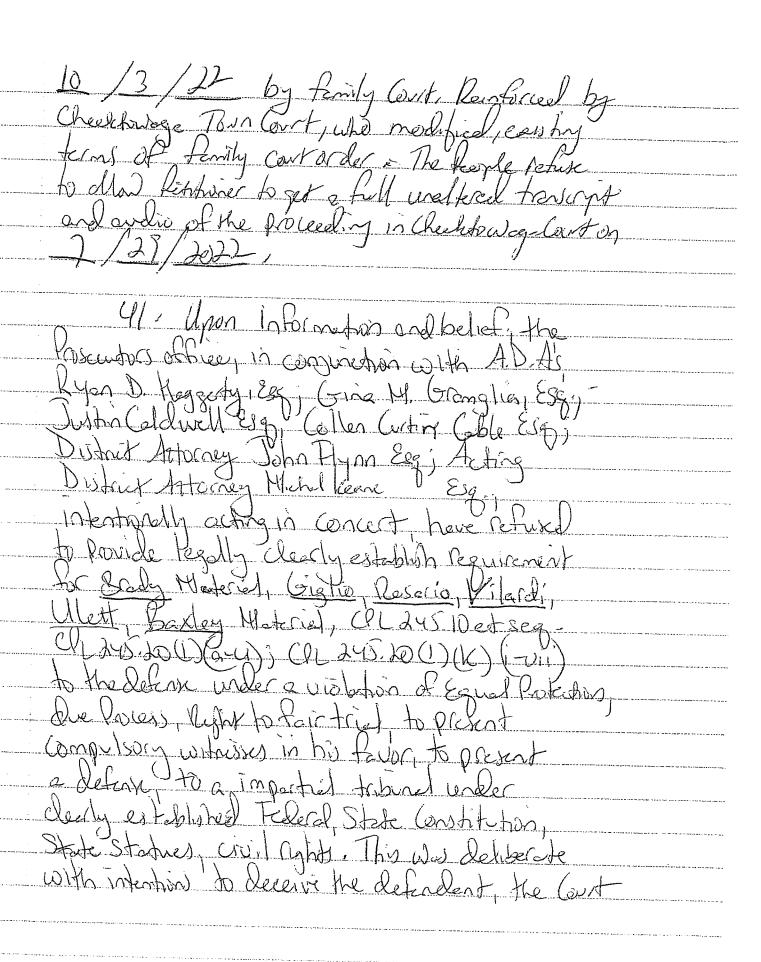
When assigned Council allegedly assymed Tooth and Cutting Tr. Esgs, they failed to over see councily representation, and allowed the policy and Custom of not chillenging mining abicovery, Orally Cybia, Pascio, Badley, What, Vilerali material, Ch 245, LOQ) (2-4); Ch 245, LOQ) (2-4); Ch 245, LOQ) (2-4); Ch 245, LOQ) (3-4) and Not chillenging alefecting (40.05 end speedy Tried Vibletonial condensations of behind was additionally certain this care to prevent a fair tried with the Public Outery

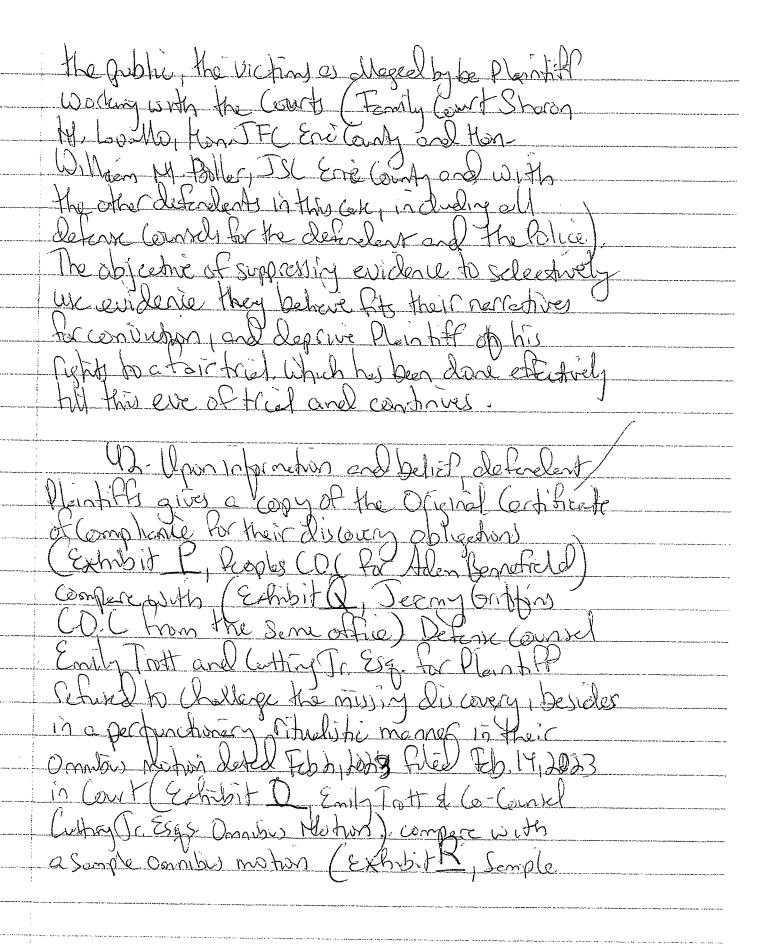
and political pressure. The Acipied would from Colleborated with the Judge Botter and the D. As Office , to allow the conviction be found with out acles water protections for the Plaint of with out obvious deficienties in the hopes cent.

39. The Stake of New York, is regransible for Linday of the Town, Cities, Schools, and protection of its citizen. In their compacity, they facted to prevent acts of meticions notice by their Turners tailires, Including the Julye William H. Boker, Es, JSC Shoran H. Levelle, Esq JFC, and its agents Knowsky these individual and openies and defendants refere to Billow the Compatitioned marelye of defending APLindiks right to Dire Voices, State of Mw 4th taled to properly trus and whiteld 9. Policy and curpos of depriving the eleteralists to have a fair fail with the necessary holi to Right their Cox. The Ste of Head York allowed wanted, Ribles , reghier , idelberte acts of its employees, to deprite debracht / Plantit of his constitutions syld, Which allowed Detectives and Co-Conspirators to Enotored psychological Cercion to bring

about are injust conviction and spain a mentally ideficient 1 emotionally disturbed individual to be mampilated, decieved into 1000 and 10

M. Upon information and be lied the State of How who State agents and employees, in the When of messive number of school shooting and mass killing jeoperalized the children of Union East of Cheek towage, when they black mailed the defend of to then homself in for a crime not charged as of the time of issuance of TOM, and your fulfilling his sale of the obligation of his black medel side, aled a 3100, convinced by Cheek towage Detective Muchael Streights Ker of Town of Cheek thousage to Convince of the Violate on after of the defendants to Violate on after TOK (Temporay Restraine Brale, Exhibit I), issued on





possess motion). Defense council for Plantit as in a conspicey to consist deterlent Plaintiff and Porchis to estad with suppossing of evidence An Docity the Roople, Court, Julyes: The technique male and feely chary when inefficient to quell Maintité inquires detente countil delayer guidence, deligability notions. Speficially hed requests and Sond bogged on Filing timiler notions. Every motion by defense counsels in this cose well eather untimely mut filed (Speedy Trad ) and meant to be dentied through complety and arcumention through crentorisis techniques, such as suppression and soon lighting instruction to obsure evidence, defenses and arguments. All ritualistic and to give the appearance of favories, in actuality anything but fair, appearance of faires.

Horney John Flyn, D. A., and Acting, District Attorney Michiel Keene D. A are aware of the cushom and practice of suppression of earlesie by the AD It in Eric County. In this high profile Core their tarties to train, supervive their allowery allowed the AD A to trample over defendent Federal and Shote Constituted Byth Equal Rotestian.
Delorers, Whyto excitated, Statuting right
to Speed And Dicoverye I order to obtain
Considering through Zeel to purish. 44. Upon information and belief Detective of Cheektowaga Volice Depertments Town of Checktowage, illegelly and unlawfully Blockmarked flow hoff and emotionedly Duty Bed to typ himself in tox ine in order for him to enforce on athire NO from Family Court ( Exhibit A 10/30/2020), to give Defendent/Plantiff no children; og they would be allowed to go indent / Plaintiff Wife who at the me had two restraining orders egainst er A Refigir from restraining order non TRO, by the Deserver Own Cheekstowinge only come to the court without counted with his Docati in the interview norm, so he could keep his head sate. Upon being arrained the astraining order

Was effective from Chechtowage, That Plan LAP would be allowed to Stay of the house P to take his Wirds elsewhere Atter Couthoux and going to the School School office officer and School Stoff at Chechdowlege Unon East, \$\$ Derendents to cell cheektowaga to Kourse , they in complish called the heeltway Detative, who efter a hips Confinge cell with Plantiff and School of Firell sod stell and school office to bee disregard, and don't entorce an Active restraining order. Destribuer/Plaintiff

(emphishors and conspirators, fundemental put the School Students and Stoff in a possible dangerow situation. Especially in the advent of mess shootings and school mesacers. This is out regard conduct, and was ment to enrage, were the Plant of to commit a crime so as to punish for a relong, due the publish from the video of the coult where the children were no where present. Two were in School, the son, Six manths old, was in the back room, 30 feet away, and could not hear, not see Soud altercation. The officer creative zeal to provide defendent / Plaintiff for the incident he dready knew about, wolfely the law, in order to entire the law and order had disable results. A violation of dre provise and was outrageous conduct.

the obleged murder, that defendent plaintiff alleged and the purported perp. The fees to working with Buthlo police depertment, searched defendants plantiff house and GO under a false guise, to search for and destroy any rounds earleine, Brady, Siglio (Pedys. 20) (1) (2-4); (Pe 27); D(1) (K) (1-4); ), Including electronic evidence in phone records media accounts, enert accounts, electronic storage medicans, event accounts, electronic storage medicans, even documents such as divorce papers, plaintiff was filling out, videos of wife whyping to month year old body, our son, and assorting their children with heads, show etc. when

in a druken Stager, sometimes in a sober mind
france. The french have this endende hat have
intentionally suppressed and of destroyed so es not by show the danger of the viction towards their kiels,
es not to show the longer of the viction
towards their kills,
17. It it was determined that the Plantiff
did commit their crimes, the imputury or actus
toos couldir and woulder been interted by the africo misconduct, meling any act a
the other milliet, metring any out a
populat of transferred indent, though a chain
61 west from tolie misanduit, overzestowness,
Zed to convit, through Blackment of Fundament!
Right to be left alone secure in home work;
School tree from Overzealous acts of office
(20 Maria Objects illevelle it it the les)
Infringing on plaintiff family rights. And convincing other to illegally violate the law and cestry all the other defendants in this cerc D Suppress testinging and evidence, typis Tho and better?
Suppen testinony and evidence than The and better
48. Upon information and belief, the trook working in concert with defence countill for the Plaintiff, have used counted as a tool
teaple working in Concert with defence countil
for the Plaintitt , here used counted as a tool
to avoid colling witness to support these claims. In a tetter to the light and ar low
claim). In a tetter to the lieple and/or low!
·

Afterny Paul Delly Esq. refuses to call any winterson, agend the Plaint Pt explicit ry hts. Therefore by possing the ry ht to computary possess and to have withers in his behalf for his delenor. This technique, should in smoke and minor is done under the guise of strategy and tactic. By defence counted for the plaintiff; however, the true agrela was delena schotage with the lands, from three court, tenty (with the lands), from three court, tenty (with the lands) for lands of the lands of

The this Scalad to Continue, Non. William He Biller, I've this Scalad to Continue, Non. William He Biller, I've Enic Country, working in Concert with the District Attorneys office, Checkfordage Town Court, Erie Country Family Court at the last hazing of October 17, 2024, with Plantiff family in the Contrology Knowing and being advised that diversery was musing a transcript were morning than the Was being denied a psychiatric defence Plantiff.
Was being denied a psychiatric defence Plantiff.

Also working with deferre counsels, Stated in a not word for word sentences that although Dentable you were abridged, the scries chardle been raysed by deferre counted certific. That water no crumstances would the trial doct be changed, a trial will be had inmediately offern, will be had innedutely it by judge Said this (get must be concluded. a Han. Tudge Boller of Eric County, then ouded to State to realition of T For murder, and his important years, He tel this, as the Unit Alminitative Tulge. of Honorable William M. Boller 50. Upon internation and befriet, this is Not the hist time he has claimed Albery's
pressure to conclude Mis Cerc, regardless of
Constrained wolking. See Transcript tebly
2024 (Estribit II, to tel 9 pages). Not
only has the Honorable Oldge almited defendant / Phintiffs Cight to a speedy Truit

not been violated, as of February 14, 2024.

But ever the District Attorneys office concluded

the Sand Clein, See Exhibit V, Reple Method to Partile late CP 200.10 notice pg 7 and

S1. Upon in Einstein and beited, the Defendent
ELMC (Evi Country Medical Center), now defendent
Phintiff on Ept 28, 2022, due to mental Mires
end alchal es a Emotional Distribed Arion, by
Way of gyl call (Exhibit W, 9.41 and)
Rohie all This of Hentil Kealth (a), Insteal
of heapty the detendent Plaintiff back on his history
Of mental illness for 25 years, his entry into CREP/CRAP almost one (1) year cartier, due to
CREP/CRAP almost one (1) year cartier, due to
a psychotic breakdown both Situation Involvery
his lote wife and infidelity, After defendant
Plaintit perents told then not to let him out
he would be still instable Firther, without
permitten patie var consultation with plaintiff
latewife nor swing her the option of holding
him they let the Plantiff out, prior to two days. Due to Plaint At history, they wilding held Alentiff for not only 72 hours, but more
two days. Due to Vanhats hubry, they couldn't
hald Alein For not only 72 hour but more
then 24 hours
St llos in lice the and belief keed the

on the previous CPAP admittance Storped for three days a year before. He was unstable had threats of hermaly and other, thus this was not an solded instance.

S3. Hence, whon information and belief according to the collegation detendent / Phain half murdered this wife in a mental illness state, when he should be been detained. Due to the negligine, tarbine to train, failure to Superiory wrong full unprotogrand, rechless, neglectful, and the Defendant ECHIC bolicy and Carbons, Reditioner / Plaint of is alleged to have demosed his wife in fant of his hall.

54. Upon imformation and behief the Defendent Dr. Ann Metzika Cocartes: if she wrote the apart (Schnist X Paych- Report) as wroten, Worldre been indicative of a confluit of interest, thus malpractice given her bies and imported report translary to be She whoshy worked for ECH C previously but on the Assyrid found from where Emby That and Aubert Cotting It. were fired from Plantiff Core due to Inettectureress. Thus the world here on interest in concoting a scenera, to identify her constituted of ECHIC, and estimated counting forms of factorial she couldn't be seen representing for soly. The acceptable in this highly hiblicand potential case, any favorable report would popully by all

reduced position This is how order or a drank not only he misconduct of the other defendants. Athinder petitioners obility to get a timely fair rely by Such late report. Also discredit ony experts without constructions in the behalf! St. On the other hand, upon information and Dehal to She did not right this report defendant Dr. Carvantes, and/or it modified by a sciendary Party Detare it rested defendant Plantiff hands. Then it would also indicate Sabotage of Plantiff detank from present Pavarable withings in his not only be management, but filher enderice of Due Rovery Underhoon, Equal Protection Uniledon, , Right to Campilian pools een cry one of the defendants or multiple to gult, insience of other

Courted to within the moving paper. 57: Defendants, Sheriff John C General and Chief Teffery Hartmen of Erie Country Holding Center, bother are employees; agents of Erie Country. In their Supercusion Note, they have the responsibility to oversee their Subordinates. 58. Defendant, Sheriff Garag of Ene County, has allowed the Plaight Ps right to Access the Courts, to be infinged upon by taking the Plaintiff legal work, refusing to give Plaintiff enough time in the Low Library? This either written and for unwritten policy, is allowing these Chronishthonel policy and/or customs. The defendant Sheriff Garcia, has been grossly negligent in in adequately supervising the subordinates who took Meintiff properly, legal documents needed for an active case, multiple cases. With regards to the law library affecting defendants rights to access the courts and petition the Court for reducts of growings and

due poiess. The Sheriff Garcia faterfort knewer Should have know the policy of limited law library access, insufficient to adequately pertrupate and Defendant against civil allegations cominal allegations, and film documents with the Court. That only one hour a week, would be insufficient to meet these needs, nor two or three hours a week to file timely documents and prepare them, of the toult of Depty Brennan, nor Druicile.

Squia, of Erie Gurty, boxed upon information and belief was aware of the Refrictory in the law laborary program and access to the Courts. As a supervisor he knew of deficiently and failed to inform train subcordinates on policies designed to avoid violation of Constitutional right.

inder his supercousier role was and is deliberately indifferent of Plaintiffs need to access the Court tronely I need to have his legal document, need for free copies, special access to the law libery and materials, and property that included previous written metanic, cases in support, extincts with specific intention based upon information and belief, working in concert with attorneys

Poul Dell Esq. the District Attorneys Office Stoff, as a short arm of the prosecution, He was and I aware of the violetion of client-attorney. Privilized and has allowed the century of copying teget mail and leaving access to Said focuments to any unscrupidous individuals, including the People to copy, dissiminate shore the contents with other parties without Plaintiff browledge Plankiff has explained the violations to Chief the tones though numerous internal complements, appelled to the highest level tower, no achor in his! behalf was taken, sufficiently to adolary this descriently. This has allowed the people, working in concert with the Sheriff office, to circumvent Plaintiffs Constitutioned, Statutory, civil rights to present adolerse, interferred with active cates, in an attempt to Sebutage Plintiff Cakes

Chief the three knowing Plaintiff has limited access to lew Cibicary reflective assistance of coursel, and no carbon paper. Refuses to fix these unconstitutional deficiencies and refuses to give copies, their isstead of getting free Capies, Ince there no carbon paper, timited low library access. Petitionel cannot

Tegible. One such motion was refused by the Cent, occording to the Judge, because of it being illegible. See Extrabit Z, No-Se methon for Transcripts i See Transcripts 4 /11/sex) where Hundred believes of It was where claimed it was un terdable. Exhibit A.

Cod Upon information and belief, Chief Hectmen is working with Eric County District Actorneys office to frustrate legal proceedings, and prevently thriefy filing.

## IV. EXHAUSTION OF LEGAL REMEDIES

available at Eric County Holding Center to try and 80 lue the problem. The greatures relating to this Complaint, where applicable. Every wideble appeal that the Holding Center Mouved Plain hit to Exercise, he with ried, all with Levisly, Plaintiff property with legal cloiuments, grievenes, completely Decisions is within these documents are the freque; Eric Country Molding Center, property and her her arbeiting, in deciding which clocuments,

When where to provide to him, ofter they filter though them and make choices unlestically

berdonjos Formation and Delict, all parties
involved, there is no plain, adequate of complete
remedy at lew to redress the wangs. There take,
with time being of the essense; the Detendants
being in tounden through complicity to prevent
eshauthor of legal Remedies in Eric Country Signal
Court, Justice Hon William M. Soller JSC, Eric
Country Family Court, Justice Hon, Shoron M. Lovallo,
JEC; the other Detendants pand herein:

Claim that does not have an exhaushin requirement of physics not have an exhaushin requirement of physics of Charles (every Shoron M. Lovello of Eric Country i working with Plaint Fls atturneys, have prevented timely litigation, preservation, appeals. Through gameman Ship, the Courty Eric Country Signere Court, william M. Boller Hun JSC. Eric Country Family Court, Shapen M. Lavello, Court of Checkstowage Court have probabled petitions of Checkstowage Court have probabled petitions of Checkstowage Court have lingander litigating clear ineffective course violations, Systemicatic

Farliers if the State under and through
Thirdwin discrimination and Equal Partition

Dislations, How boller. Eric County Signame Court

Stated plaintiff must go through otherneys

(Exchibit At, Transcripts 4/11/2003 pg 1 to)

Which was Circumstary not filed although

Decewed through the mail. It was harded

to counsels and Plaintiff total he has to

go through Counted Total of Cutting Tr, also

clatendents in this case of As Similarly,

Family Court Judge, Kon Lovallo, Cabrell amotion

(Extinsit L) responding no parse tiling

Carbibit K) to prevent appeals, passiveshin

and extraording.

exhaustion not effectively, we greetiveled by tempy and Comined Court of Eric Countries rulings, The detendants in this case essisted in these constitutions, to prevent aglegate feir trial, judicial process, and the recorder pathing hundreds of School Children at risk due to plus eaching with and when he direction of Detechnes and Cheekpowers work, to Violate clearly astablished technical and State Fundamental

rights to lie process thereby, through these overves, the Defendants were attempting to hile suppress clear and unequiviced Miscardingt by all the Defendant. These violations in this case are structural, procedural and urged by the people to hide their violations 67. Upon information and belief, the Defendents can only hide their evidence of clear mis wordent by forcing a trial and Suppressing all favorable evidence, and cordence lesting to other evidence of Reviewing Court world only review exhaustell Usines and claims. Which the fearle used defendant / Plaintiff own countels to retard, Chill trustrate, impede, thwart preservations Successive retrible, after destruction and manipulation of evidence towardble to the occurred There by 1 any motion would be claimed to be Futile Physising preservation under the Guise of Plantiffs atturneys defente tacties and strategies. Thus each while I must be deemed extrawted?

VILEGAL CLATMS

a result of the wrongful, relievely, negligant, and care less acts and/or amissions of the Detendents Plaintiff has sustained significant damages, including but not limited to unconstructional cletariment pain and suffering, psychological clamages, mental and entrinal pain and suffering, list wages, four of turk appoint and sources, economic loss, and according to the Reple, wrongful death of his loved wife, Keinera Bernefield, loss of his son, family, Sty children I Plaintiff specifically pleads the 5th U.) Cent Amend, on couning his wifes death in front of his children.

68. Plaintiff realleges and incorporates by reference, paragraphi 1-67. 69. The clear violetions of mujorduct Suppression of evidence, denied of eccess to the Court, frustation of legal procedures, indifference to medical/Mental needs, unsete practices, Violetin of Plantite Statutory rights, Constitutional Right, Civil right, Violation of the closely established Federal and State Constitutional amendments, Statutory law, Guil Rights Law. Industry, Plantit Adam Bennevelly Sr. rights and violeted United States Contitation, First, South, Fifth, Sixth, Eighth, Fourteenth; Right to patation, the government for redress of grievenus; Right to be secure to their person, houses, pepied, and effects, ago, not uncesigeble Seaher and ferzurch Rellant be Violated, and no warranty shall issue, but you probable cours significal by oath or office to searched and the parons or things to be seized, Marshell any person be subject for the same of fense to be
put twice in jeoperaly of life or limb, nor shall
be compelled in any criminal care to be a witness
against himself, nor deprished of life fiberry, or

property without due processof law; Excessive boil shall not be required, not excessive free imposed nor coul and unusual punishment inflicted; No State shall make or enforce any law which shall aboridge the privileges or immunities of citizens of the United States; now shall any state deprive any person of life liberty, or property without due process of law; our denyto any person within its jurudution equal protection of the law 1645. Constitutions almost identically incorprogres the federal constitution in this paragraph, Article One, Sections Five, Six, eleventh, tourteenth; Civil Rights Can Sand 12 (eight and twelve) the other statues and laws a versed to direitly, indirectly which tells under the todesol and It to Constitutional provision to Due process and Equal Protection.

or complete, remady at law to redress the wongs described herein, Plaintiff has been and will be continue to be irreperably injured by the conduct of the detendent unless this court grants the declaratory and injurchine relief which plaintiff seeks.

VI- PRAYER	FOR RELIEF
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WHEREFORE, plaintiff respectfully prays
that this court enter judgment granting
Plaintiff:

Omissions described herein violated plantiffs

(ights under the Constitution and lows of the

Cloved State).

Leserbeil her in volated plaintiff rights under the Constitution and lews of the Vorte under Supplemental Justifiction jet.

omission described here in are considered and determined to be outrageous government conduct that "Shocks the Consideric" in Violetian of Plaintiffs Dire Poicess Rights Federal and My S. Constitutional Provisions and Civil States stated and/or everced to

73. A preliminary and permanent injunction

No. 01849-2022 entitled freeze of the State of New York us. Adam Bennefield, Ene County. Supreme Court; Family Court Docket Ho, HA 1062422 V-10500-22 et al. Erie County Family Court, entitled In Matter of Adam Bennefield of, et al.

73. The Boss tocthe pretiminary presdution, Is without this Courts help Plantiff will befored to Trich without witnesses in his behalf, without a defense, in his behalf, without offichie assistance in his behalf, without due process in his behalf exceeding the bounds of speedy toid, and there would be a manifest injustice, miscarraige of
Justice and violation of Plaintiffs transferential
Constitutional right. The Court, in Confunction with
the other Defendants of Ene Country, are using practice by the defendant and money denings
will not fix his involes, clone, without this Court help, Plaintiff obility to defend at trial and supered at trul before federal Court a Plantite Will suffer more if the injunction is desired than the defendent will suffer of it is granted, Further,

that prevents the Defendants, Honorable William
M. Boller, JSC, Erie County; Honorable Sharon
M Lovelle JFC, Erie County; District Attorney John
Flynn (Acting District Attorney Hichael Found of
Ene County, their Successors in office a goods
and employees and all other persons acting in
Concert and participation with, from Tepjained
from taking any further action, prosecution on
Concert and participation with, from Legioned from taking any further action, prosecution on Indictment No. 73197-22/00/ ECDA/egacy
NO. 0, 1899-2022 entitled keeple at the state of flew tork
J. Adam Gennotreld, Ene County Supreme Court;
tamily court Docket No. NA-10624-12, V-10500-
22, et al, Erie Country Family Court entitled In Matter of Adam Bennefield Ir, et al
Matter it Adam Bennetield Ir, et al
Mir Di 10 +
74. Plaintill seaks a Temporary Restraining
Order, preventing the Defendant, Honorable William

Order, preventing the Defendants, Handrable William M. Biller, JSC, Eric County; Kenerable Shown H. Lovalle, JFC, Eric County; Kenerable Shown John Flynn (Aching Diffrict Afformed Hichael Keens) of Eric County, their Successors in office, agents and employees and all other person acting in Concert and participation with, from Lenguised from Jaking any further action, prosecution on Indictment No. 73197-22/00/ ECDA Legary

a pretiminary injunction will serve the public interest in the Truth-Sceleing function and fact-finding from expessing the outregeous governmental conduct, and foster respect for the integrity of judicial processes and checks and belance system

75. For the Same Rosons the Plaintiff Scels a feranet and Preliminary injunction, Paragraph 73-75, the Glaintiff relleges col Incorporates by reference into the Keguesttor a TRO (Temperary Restraining Order) against the Defendents is Paragraph 73-75 Hon. Loudle, JFG Hon Bolle, JSC; D. A. Flynn (Acting DA Hickory Kegne) all persons eiting in concert with or pertugued and with them, waiting for a pretiminary improchase Would result in innedute and irreparable injury loss and damage. All Firther proceedings under Indo # 73197-12/001, ECDA Legery # 01849-1020; Reple V. Benefield; Court Darlet # NA-10624-22, VIDO IL et al, at Ene Country must be ceased and desisted I moredially, to parewe evidence, testimony, right, Disprey, Ind. paperaly Gislio Makeriel, the light to a fair first before fair tribing, and to prevent Spilation of evidence and tither conspiratorial

Due hows walder, including circultorious

76. Plantiff Seeks a Patiminan 15 junction and temporary restraining order against Erie Country Short Tolkin Garcia, and Chief Hertman Erie Country Holding Center on each of their officers, egents, employers, and all persons acting in concert
with or perticipetion with them requiring them to
Seture definedants/Plantiffs property including legal
documents, notion paper works, cakes, privileged correspondence and work goducts, etc. takes from plantit on shirt 6/26/2023; to Stop Interference with access to the Gust including but not limited to copying of plaintiffs Legel mail, privilized correspondence, fequing plaintiff to be given of less ten (10) hevel weekly access to the Courts through Cow Cobrang access; Allaw think It to fendout leget and other - documents with tamily visiters to attempt to mest cout dealines, requiring the court to allow free legel copies, postage, special handling Cost to meet thek overt deed (ines, imposed In conjunction with parallel proceedings, sufer porcedings

injunction requiring the tean William Missoller, DSC. from forcing tried to begin without due Process and Equal Right Constitutional protections, against closely established tederal and State constitution and tows, which would result in irrevocable horn to defendent and the interest and integrity of the Justice system and government.

178. Plaintiff Seeks a preliminary
Injunction against the Defendants than Shown
It. Lovella, Cequiring the court to inform
the Court why they we punished the children
alleged to have been victimized, and Defendants
parent, the Children Poternal Conneparents,
from Seeine each other, Invisitation of clarity
established school and State Constitutional Amendments
and decisional faws, punitively mediciously,
captivisity and a complete about of discretion.

Acting D.A. Milhael keene D.A. Frank Clark, All A.D. Ai involved with this cake, Hen. William Boller all of Eric County, to bring forth evidence

48

Why in violation of Equal Protection Right and Duelous right, the People and Court Foiled to provide defendant with the Discovery, Brady Caplie Mosario, Viladi, Baxley, Ulett, CPLZYJ. NO (1)(e)(i-vii'); CPL 24520(j)(g-4); CPL 245.10 et Sex; and allowed such preversion and frustration dicied processes by treating Plaintiff Allon Genetical, and his rights to informat are is treated completely unequal to other dokadents. Vehhoner/Plantiti COC(Costhicke of Compleme Ectibit P) another detendants CO.C (Certificite of Complance , Jereny Griffin (Exhibit Q), another CUC, (Exhibit A). Why when the court we advised of these deficientales, no offenpt was made not addressed to repert this Constitutional wany prior to asticipeted triel and leagles justification to contations of the Detrobents

declarating judgment, sexpaining that Plaintiff is entitled to the Potentians of Duracess and Equal Protection. That U.S. Constitution, NYS

49

Constitutional provision and civil rights laws	***************************************
require that whether a dofendant Plaintitt his	
a heinow crime charges against him or not, he is Still entitled and its required under Due houses and Equal Protection, to be provided with Equal treatment of less available	
he is Still entitled and its required under	
Die Knieis and Egnel Protection, to be provided	
defense shaber of less ovallable	
defences, Stepheny lows and equal freedment,	
81. Compensating claneaes in the anabent	
of \$ 5,000,000 against each defendant,	
81. Compensatory claneges in the anotherit of \$1.5,000,000 against each closendent, jointly and severally,	
2. Pinisher daneges in the amount of	
\$1 10,000,000 against each defendant, jointly and severally.	
	*****
83. A jury trial and wies triable by	*******
jury.	
84. Plaintiffs (ost in this Suit	
2	
50	
50	

Case 1:24-cv-01064-JLS Document 1 Filed 11/01/24 Page 141 of 150 deens just paper and equitable, I Benefild at 22, 2024 Respectfully Sib mitted Adam Benneticle, 44965 Erre Country to loting Center 40 Delaware hence Bottob, New York/4202 VERIFICATION hereby verify that the matters alleged therein are true, except as to metter alleged to be in intermedian and belief, and as to those, I penalty of pegjury that the toregoing it the and correct Executed at Bittalo, and New York Servefield of plaintiff

Case 1:24-cv-01064-JLS Document 1 Filed 11/01/24 Page 142 of 150

Ind. #73/97-24/01 at the Eric Gonty Supreme Court, 2. I heard the fully colloquy that

nor months stated to could be suppressed.	took place between the Court, Coursel
The second second section for the second second	took place between the Court, Countel, defendant and District Attorney.
en og mengenskriverede også ett i prikjesed dogså	
	Two additional Cancerson individuals in
the fall of the control of the contr	the Cout nom as well. The hearing took dece
ag tada tand 171 s amaga da minazira da s	- around eleven o'clock am, when waterest
овић, убита Мола на напред Волуческе давена	Cox wer supposed to be brought before the court. The proceeding was temporary postponed
	to the starting due to consider the life
to the transmit of the state of the same of	Esq being absent to the hearing It started who counter Poul Dell Esq come in , and the Defendant was brought forth scan there
***************************************	Whe Counselor Poul Dell Esq Come in , and
e dan his sayari i majari ki kabasi sayar ngajari Sayari dan ng hilip i sa manashang nang mg	after to Start the proceedings.
We ted the debate of coding a group	
	between Defendant and Counsel Dell. As
	Detrices detendant and Counted Dell As
The second second second second	Seterdent wented to speek to the Court and Atty Paul Dell, did not went him speeking, At one lount defendent speke to the court,
e nodernos qui carros esperações de la compessaçõe de la compessaçõe de la compessaçõe de la compessaçõe de la	At 300 Point Dofendent spoke to the court,
a designation of the same and the same of the same	Holling the hen. Judge he had something to Day a Cout Judge Boller, chided the defendant For Speaking.
and the second s	For Spelin,
enter a traph of the state of the state of	
in a consequence of the conseque	5. I observed defendent specking more

prudently and vigertly with the Counseler Dell. At one point, the ton Judge Solver again Childed elotendent, and chilled his offenpt
At one point, the Kon Julge Botter again
Childed defendant, and chilled his attempt
at speaking with Atty Dell why the Court was speaking.
Was speakings
6. After nunerous arguments and
Protests civily between Council Well and
the defendant. The Court Frakly released,
the defendant. The Court Finally relented, and asked attorney Dell IT he worted the
detendant to speak Attorney Dell reluctantly
detendant to speak. Attorney Dell returbantly allowed dependent to speak.
V
1 I Sow the desendent with
nunerous downerts and he cold rested the
Court, soying numerous things, such as:
A the was being denied Due Process
B. He was being denied Equal Protection
- He was being denied the right to
B. He was being denied Equal Protection C. He was being denied the right to here a detense put tooth is his
behalf,
D, the was invidiously discommented
D, the was invidiously discommented against due to asystematic facture
Including
including (1) of assigned counted
J

Case 1:24-cv-01064-JLS Document 1 Filed 11/01/24 Page 146 of 150 to provide finds thosely for mental examine and transcripts (11) late mental examination due to Court on D. Ai forly to have descelent eveluted be at usue presuent to Her Okelhoma E. Defendant protestell about the entitiate of Compliance being Complete datestive and that in the Courtnoon as earline he had another persons, Jeany Gotfins mor Rhoble Certificate of Compliance (COC). I understood as well that he had more evidence and COC as well, sleaning from Detendent, Statements es proit F. Although the colleging well
more in depth and Betendent hed much more to say, he Was Shut down by the Court. However, not before he explained More of his allegations was countered with

any contentions of the folisty of his Statements
by the Court, the Reple, not daknik Council
8. Before the conclusion of the
hearing the court spoke of its disgust with
the detendent and the Dreigure from Albay
I recoll Statements like and or events soil
like (by the Judge William H. Boiler)
A. You bew your wife's brains
optio front of her kids
B. Administrative judge in Albany Wents this defendants care
Wents this defendants care
Concluded and closel.
Co There will be no delay for
any reason. We will start trial
and priling Jurars in Havember.
D. Counsday should be reised the
le ficiencies
E. The Court Viciously closed the
Kerine
The Hon. Judge was angry, and was yelling at the defendent and pointing at him why he spoke to and at the defendant.
the defendent and pointing at him who
Snoke to and at the defect of
1 Concession of the concession
9. D. Defel + Dici Han II
9. The defendent, during these colleguie

that the Court and DA's are suppose to have adual roll; and not just convict but see justice is done and defendants rights are protected. But in this care, the Court and DA's Pailed in their duties.

9. Defendant addrived the court
Speaking of late cell phone extraction over
Homonths ofter purported come that was
hermful to the defense, which was not addressed
by the Court of no one else the Court numerous
Undetwood to the Court, Mone of these undetwon
were addressed on the merits.

address the Court Stating their was miscardant and the leagle are using the Council as a power to thowart rights to appeal. To force the care to trial, without preserving usines, or to late to be effective. The Court was absolutely not happy with defendants cleims:

a pending lowswit and evidence would come out that purple are trying to hide, such of misconduct.

Make one and with a first purple hand if a real year state of the region	The only time the projection spoke was at this
	Colors at (The Day Claimed its not
	The only time the projector spoke was at this point. Where the judge claimed its not relevant (The wrongfuldenth of kears thudger) and asked the people their opinion of
A STAN A COUNTY OF THE PROPERTY OF THE PROPERT	ceshether it was relevent, the protecutor soil
and the second section of the second section is a second section of the second section of the second section is a second section of the section of the second section of the second section of the second section of the section of the second section of the section of	no, Detense countel seed nothing, in response
The state of the s	
	of this proceeding is produced and occurate. In sure it would reveal the complete truth,
	tot this proceeding is produced and occurate.
mana fine a company of the Parish parties of sind year	In Sure It would reveal the complete truth,
the filty commences the right of the comment	minus minute errors in reference to exact words was used.
	I declare under penalty of perjury that the foregoing is true and correct. Executed at, City of Butfalo, State of New York on 10/2/24,
Para Sagaran (1984), Panda a Maraji Niji (Niji addi garan i panja Ma	the foregoing is true and correct. Executed at
that i decided appropriate that the temperate shall provide the experience of security and	City of Butfalo, State of New York on 10/3/24.
t von hand had had transmissing printer and discuss with	
	MAA
:	Will a Kantall
	There Barella

Document 1 Filed 11/01/24 Page 150 of 150

JS 44 (Rev. 04/21)

## **CIVIL COVER SHEET**

The JS 44 civil cover sheet and the information contained herein neither replace nor supplement the filing and service of pleadings or other papers as required by law, except as provided by local rules of court. This form, approved by the Judicial Conference of the United States in September 1974, is required for the use of the Clerk of Court for the purpose of initiating the civil docket sheet. (SEE INSTRUCTIONS ON NEXT PAGE OF THIS FORM.)

purpose of initiating the errit at	Select bileeti (BBB ii ib ii ie e	Trong on The British of the British									
1. (a) PLAINTIFFS Adambennetiel Sr.				Honorable William H. Boller JSC							
(b) County of Residence of First Listed Plaintiff  (EXCEPT IN U.S. PLAINTIFF CASES)				County of Residence of First Listed Defendant (IN U.S. PLAINTIFF CASES ONLY)							
				NOTE: IN LAND CONDEMNATION CASES, USE THE LOCATION OF THE TRACT OF LAND INVOLVED.							
(c) Attorneys (Firm Name, A	Address, and Telephone Numbe	r)		Attorneys (If Kno	wn)		9 A	$\Gamma$ $V$	10	G A	
P(0-5							N E	<u> </u>	TO	<b>U T</b>	
II. BASIS OF JURISD	ICTION (Place an "X" in	One Box Only)	III. CI	TIZENSHIP OF (For Diversity Cases Of		NCIPA		(Place an "X" and One Box fo			
U.S. Government Plaintiff	Federal Question (U.S. Government)	Not a Party)	Citiz	en of This State	PTF	DEF 1	Incorporated or P		PTF 4	DEF 4	
2 U.S. Government Defendant	4 Diversity (Indicate Citizenshi	ip of Parties in Item III)	Citiz	en of Another State	2	_ 2	Incorporated and of Business In		5	5	
				en or Subject of a reign Country	3	3	Foreign Nation		<u> </u>	6	
IV. NATURE OF SUIT		rly) RTS	F	ORFEITURE/PENALT			for: Nature of S KRUPTCY		Description ER STATU		
110 Insurance	PERSONAL INJURY	PERSONAL INJUR		5 Drug Related Seizure			eal 28 USC 158		e Claims Ac		
120 Marine 130 Miller Act	310 Airplane 315 Airplane Product	365 Personal Injury - Product Liability	F ₆₀	of Property 21 USC 8 0 Other	881	423 With	ndrawal JSC 157		Tam (31 US 9(a))	SC	
140 Negotiable Instrument	Liability	367 Health Care/		o other		INTE	LLECTUAL	e Reapportio	onment		
150 Recovery of Overpayment & Enforcement of Judgment	320 Assault, Libel & Slander	Pharmaceutical Personal Injury				820 Cop	RTY RIGHTS	410 Anti	itrust ks and Bank	ing	
151 Medicare Act	330 Federal Employers'	Product Liability				830 Pate	nt	450 Con 460 Dep			
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(Excludes Veterans)  153 Recovery of Overpayment	345 Marine Product Liability	Liability PERSONAL PROPER	rv	LABOR	Argina -	840 Trac	lemark and Trade Secrets		rupt Organiz Isumer Credi		
of Veteran's Benefits	350 Motor Vehicle	370 Other Fraud		0 Fair Labor Standards			of 2016	(15	USC 1681 c	or 1692)	
160 Stockholders' Suits 190 Other Contract	355 Motor Vehicle Product Liability	371 Truth in Lending 380 Other Personal	72	Act O Labor/Management	32	SOCIA	L SECURITY	_	ephone Cons tection Act	umer	
195 Contract Product Liability	360 Other Personal	Property Damage		Relations	F	861 HIA	(1395ff) k Lung (923)		le/Sat TV urities/Comm	modities/	
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210 Land Condemnation	440 Other Civil Rights	Habeas Corpus:		1 Employee Retirement				893 Env	rironmental M	Matters	
220 Foreclosure 230 Rent Lease & Ejectment	441 Voting 442 Employment	463 Alien Detainee 510 Motions to Vacate		Income Security Act			L TAX SUITS es (U.S. Plaintiff	895 Free	edom of Info	rmation	
240 Torts to Land	443 Housing/ Accommodations	Sentence 530 General					Defendant) —Third Party	896 Arb	itration ninistrative I	Procedure	
245 Tort Product Liability 290 All Other Real Property	445 Amer. w/Disabilities -	535 Death Penalty	10111	IMMIGRATION	arcial)		USC 7609	Act/	Review or A	Appeal of	
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V. ORIGIN (Place an "X" is	n One Box Only)										
		Remanded from Appellate Court		pened And	ınsferre other D <i>ecify)</i>		6 Multidist Litigation Transfer	19-33-00-3	8 Multidi Litigati Direct	ion -	
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VII. REQUESTED IN COMPLAINT:	CHECK IF THIS UNDER RULE 2	IS A CLASS ACTION 3, F.R.Cv.P.	B 3	EMANDS	0		HECK YES only U <b>RY DEMAND</b>				
VIII. RELATED CASI IF ANY	E(S) (See instructions):	JUDGE DING	m M	1. Adlo ( &	iele	J BOCK	SC ET NUMBER				
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